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SOI BULLETINA

Department of the Treasury Internal Revenue Service

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This report contains information on: unincorporated business activity, both-sole-proprietorships and partnerships, for 1980; income paid to and tax withheld from nonresident aliens for 1980; taxpayer usage of the 1981 individual income tax returns; capital asset transactions reported on individual income tax returns, 1973-1980; and third quarter 1981 windfall profit tax liability. In addition, there is an appendix consisting of selected historical data for individuals, corporations, sole proprietorships, and partnerships, as well as data on gross internal revenue collections.

Additional unpublished data concerning these topics are currently available upon request. Further information may be obtained by writing to the Statistics of Income Division, Internal Revenue Service, Washington, DC 20224.

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COMMISSIONER OF INTERNAL REVENUE

Washington, DC 20224

July 26, 1982

The Honorable Donald T. Regan Secretary of the Treasury Washington, DC 20220

Dear Mr. Secretary:

I am transmitting the Summer 1982 issue of the Statistics of Income Bulletin. This report has been produced in accordance with the mandate of section 6108 of the Internal Revenue Code which requires the preparation and publication of statistics reasonably available with respect to the operation of the internal revenue laws.

Presented in this issue are recent financial and tax data obtained from tax returns and associated supporting schedules. A new feature, commencing with this issue, is the presentation of several statistical time series covering income and tax data from individual, corporation, sole proprietorship, and partnership returns, for selected years from 1970 to 1980, as well as gross internal revenue collections, by type of tax, from 1979 through the first three quarters of Fiscal Year 1982.

With kind regards,

Sincerely,

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Unincorporated Business Activity for 1980

By Robert A. Wilson*

The recession that occurred during 1980 is clearly evidenced in the first tax return statistics on unincorporated businesses for the 1980 Income Year, as profits plummetted sharply after having reached record highs the year before. For sole proprietorships, profits dropped from \$60.8 billion to \$55.4 billion. For partnerships, the drop was far more pronounced, from \$15.2 billion to \$8.2 billion.

A more complete picture of the impact of the 1980 recession on the Nation's businesses as indicated by the receipts, deductions and profits they reported on their tax returns will not be possible until later this year, when the first 1980 statistics for corporations become available.

This article deals mainly with partnerships and Table 1 presents the first statistics for 1980 concerning them. In order to complete the picture of unincorporated businesses though, Table 2 presents somewhat similar statistics for sole proprietorships, which are covered in more detail in another Statistics of Income report, now available [1].

MAJOR CHANGES, 1979 VS 1980

Comparisons summarizing the position of partner-ships and sole proprietorships for 1979 and 1980 are provided in the table below and show how the number of businesses and the volume of business reported each increased from 1979 to 1980. They also show how profits declined, notwithstanding these increases. In evaluating the data shown, the fact that receipts and profits have slightly different definitions as between the two legal forms of business organization should be kept in mind [2].

Unincorporated Businesses	<u>Income</u> 1979	Year 1980	Change
		ber usands)	
Sole proprietorships . Partnerships		12,702 1,380	3.0% 6.2
	Total Re (billi		
Sole proprietorships . Partnerships		\$505.9 292.0	3.7 13.1
	less [Income Deficit Lions)	
Sole proprietorships . Partnerships		\$55.4 8.2	- 8.9 -46.0

As shown below in Figure A, total active partnerships continued to grow in number during 1980 in nearly all industry divisions, even with the

recession [3]. Firms classified in the finance, insurance and real estate division continued to dominate the number of partnerships and at an increasing rate that reflected in large part the growth in real estate undertakings. For 1980, businesses in finance, insurance or real estate accounted for about 46 percent of all active partnerships. Five years earlier, they accounted for 41 percent, and ten years earlier, 37 percent.

Figure A. -- Partnerships by Industry

		(thousands)
Industry	1979	1980
Total	1,300	1,380
Agriculture, forestry		
and fishing	125	126
Mining	28	3 5
Construction	75	67
Manufacturing	30	30
Transportation and		
utilities	20	20
Trade	205	200
Wholesale	32	32
	173	168
Retail	1/3	100
Finance, insurance and	C77	/77
real estate	577	637
Finance	139	166
Real estate	431	464
Services	239	263

Figure B helps show where the decline in partnership profits occurred.

Figure B. -- Net Income Less Deficit by Industry

Industry	Net		less Deficit lions)
		17/7	1700
Total	• • • •	\$15.2	\$8.2
Agriculture, forestry			
and fishing		1.1	0.5
Mining		-2.5	-4.2
Construction		2.1	1.6
Manufacturing		0.5	-0.5
Transportation and			
utilities		0.4	0.2
Trade		2.9	2.5
Wholesale		0.9	0.9
Retail		1.9	1.6
Finance, insurance and	1		
real estate		-0.5	-4.2
Finance		-0.5	-1.4
Real estate		-1.4	-3.3
Services		11.3	12.4

^{*}Chief, Coordination and Publication Staff. Technical assistance was provided by Patrick Piet, Special Projects Section, Corporation Statistics Branch.

Partnership profits for Income Year 1980 were influenced not only by the recession, but also by increases in the costs and expenses recognized in conducting a business. The deduction claimed for interest paid on business indebtedness was a major factor. Among other effects, the continued rise in interest rates led to another sharp increase in the deduction, up from \$21.3 billion for 1979 to \$28.4 billion for 1980. The sharp increase in this deduction actually began with 1978, initially contributing to a lower rate of increase in profits (for that year and for 1979), followed by the steep decline witnessed for 1980.

Because many partnerships are engaged primarily in investment activities, it is not surprising that, based on the industries in which it occurred, most of the interest-deducted—was—related—to_investment_projects, rather than to loans or notes to finance the ordinary day-to-day operations of a business or farm. Thus, partnerships in three of the four industries which, together, accounted for 75 percent of the total 1980 interest deduction, were engaged mainly in financial or real estate dealings. The table below shows the interest paid reported for these four industries; the data are presented for 1980 as well as for 1977, the year before the beginning of the rapid rise in the interest deduction.

Industry		est Paid llions) 1980
Total	\$13.5	\$28.4
Farming	8.0	1.6
brokers and services Holding and investment	. 0.4	1.4
companies	0.4	2.7
and lessors of builders All other	8.7 3.2	15.6 7.1

Figure C shows the relationship between partnership interest deductions and profits for the 10 years ending with 1980. The concentration of the interest paid deduction on returns with deficits is unique to partnerships; for corporations and sole proprietorships, those with net income typically account for the majority of the deduction.

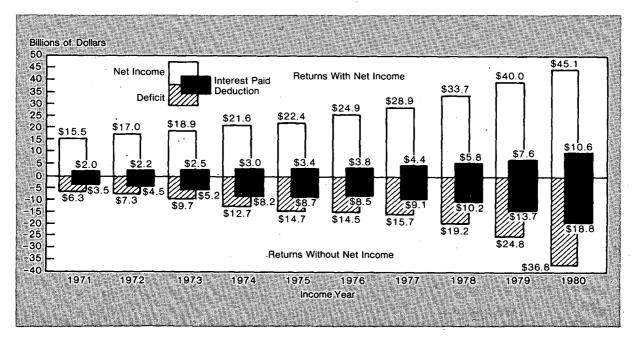
Interest reported as income was only about twofifths as much as the amount reported as a deduction.
Thus, the rising interest rates that led to the
increase in the interest deduction had little offsetting effect on the income side of the ledger,
which only served to reinforce the downward slide in
profits for 1980. This kind of situation can be
contrasted with that of the corporate sector which
contains most banking and credit institutions and
where, as a result, statistics for interest income
tend to offset those for interest deducted, with a
minimal effect on the total corporate profits data.

Another major deduction for which there was a sizable increase was depreciation, up by more than 20 percent over 1979. The generally more liberal depreciation allowed for tax purposes permitted partnerships to reduce their 1980 profits by nearly \$21.6 billion. Real estate operators and lessors of buildings reported the lion's share, \$10.8 billion or 50 percent of the total. Farm partnerships were a distant second, with \$1.6 billion or 8 percent of the total. These same two industries dominated the depreciation statistics for 1979 as well.

Figure D shows how profits were distributed for 1979 and 1980 as between partnerships with net income and—those—without.—This—table—helps pinpoint the decline in profits to a marked increase in the total deficit reported by businesses without net income, rather than to a decline in the net income of profit-reporting businesses. The latter's profit continued to grow at a steady pace as evidenced by Figure C. Related to the increased growth in partnership losses was the marked increase in the number of businesses without net income. This increase can be contrasted with the much more

Figure C.

Partnership Net Income and Deficit and Deduction for interest Paid, 1971-80



moderate increase in the number with net income. The same growth patterns also characterized 1979, although the net result was a slight rise in total profits over the previous year.

Figure D. -- Partnerships with Net Income or Deficit

Partnerships	1979 Number (the	<u>1980</u> ousands)	Change
Total	1,300	1,380	6.2%
With net income Without net income		774 605	1.0 13.3
	Net Ir (bill:		
Total	\$15.2	\$8.2	-46.0
With net income Without net income		45.1 -36.8	12.8 48.4

The decline in 1980 partnership profits was not accompanied by a decline in overall partnership operating receipts ("Business receipts" in Table 1). On the contrary, receipts rose, although as shown below, at a reduced rate compared to 1979. Receipts for purposes of this table and of Figure E which follows may be compared to "total receipts", shown earlier. The latter, a somewhat larger amount, also includes the income from investments reported by partnerships whose investments were incidental to their principal line of business.

Income Year	Receipts from Operations (billions)	Annual Increase
1976	\$157 . 6	7.9%
1977	176.5	12.0
1978	214.9	21.8
1979	253.0	17.7
1980	286.0	13.4

Figure E shows the change in receipts between 1979 and 1980 by broad industrial groupings.

Figure E. -- Receipts from Operations by Industry

		om Operations llions)
Industry	1979	1980
Total	\$253.0	\$286.0
Agriculture, forestry and fishing	20.8 9.7 19.7 13.1 5.4 58.2 20.5 37.7 76.3 21.2	21.6 13.2 18.4 15.3 5.9 65.8 28.4 37.3
Real estate Services	51.8 49.7	60.6 58.6

PARTNERSHIP INDUSTRY HIGHLIGHTS

In the aggregate, the most profitable industry division was services, where both receipts and profits rose, despite the downturn in business for the year. While this pattern was uneven by industry within the services division, the various declines indicated by the more detailed industry statistics shown in Table 1 were more than countered by the increases in two categories, legal services and medical and health services. For legal services, receipts increased from \$12.4 billion for 1979 to \$14.1 billion for 1980, while profits increased from \$5.8 billion to \$6.6 billion. For medical and health services, the increases were tied directly to those reported by physician partnerships. Receipts and profits of physician partnerships increased from 1979 to 1980 from \$3.9 billion to \$5.6 billion and from \$1.8 billion to \$2.4 billion, respectively.

Agriculture was an example of an industry division where sales increased, but where profits were down considerably compared to 1979. Thus, receipts from farming (which accounted for most of the activity in this division) increased from \$18.6 billion to \$19.2 billion, while profits dropped almost in half, from \$0.9 billion to \$0.5 billion. A contributing factor was the interest paid deduction shown above, which increased by about one third over the year before.

Construction witnessed a decrease in both receipts and net income. The combination of increased interest rates and reduced new housing starts during 1980 were undoubtedly factors. The ripple effect of the declines was also apparent in related industries in other industrial divisions, particularly in manufacturing (for lumber and wood; furniture; and stone, clay and glass) and in retail trade (for dealers in building materials, furniture, and home furnishings).

materials, furniture, and home furnishings).

Quite apart from the declines in the construction industry, and in the industries that were dependent on it, were the declines in certain retail trade industries. Sales of automobile dealers dropped and so did their profits, with the latter down from \$421 million to \$273 million. Profits of general merchandise stores fell from \$54 million to \$34 million and those of apparel stores, from \$115 million to \$63 million. Aside from these specific industries, the trade division in total (the sum of wholesalers and retailers) was characterized by increasing sales, but declining profits. However, the increase in sales was due entirely to wholesalers. Retailers taken as a whole experienced a decline in sales as is shown in Figure E above. There were major exceptions, however, within the retail group. Of these, gasoline service stations and grocery stores each showed significant increases in receipts, even though their profit picture was far less favorable.

Unincorporated business is often characterized as being largely comprised of trade and service firms and, of course, most farm businesses are also unincorporated. In contrast, manufacturers, public utilities, and financial institutions are often associated with the corporate form. Partnerships tend to follow the pattern for unincorporated business with large numbers of firms engaged in trade and services, but they are also unique in that they include large numbers of firms classified in finance and especially in real estate. These latter industries are not only the largest in terms of the number of partnerships, but also the largest in terms of partnership receipts.

The effect of finance and real estate can readily be seen from Figure E, which shows that for 1979 and 1980 these two industry groupings accounted for well over one-fourth of all partnership operating receipts. When profits are disaggregated for the two industries, they, too, accounted for a disproportionately large portion of the totals, about one third of the total net income and nearly one half of the total deficit

reported for all partnerships. Three groupings within finance and real estate were responsible for this predominance: within the finance group, security and commodity brokers and services, and holding and other investment companies; and within the real estate group, operators and lessors of buildings.

PARTNERSHIPS AS TAX SHELTERS

A large part of the real estate activity reflected in the statistics may be the result of the higher-than-average incidence of tax shelter arrangements involving limited partnerships that characterize this industry [4]. These arrangements often involve land purchases and the construction, management or operation of office buildings, apartments, or of building -complexes-such-as-shopping-centers.-_According_to_the partnership statistics for real estate, one group, real estate operators and lessors of buildings, accounted for most of the activity: 84 percent of real estate partnerships and 28 percent of all partnerships; 14 percent of the total net income of all partnerships and 27 percent of the total deficit. In addition, the partnerships in this industry reported sizable amounts for depreciation (already noted), \$15.6 billion for interest paid (55 percent of the total and 24 percent more than 1979) and about \$2.0 billion for net longterm capital gains allocable to partners. Most of these deductions and capital gains showed up on returns of partnerships that reported a loss for the

Other industry groups that are known to include above average incidences of tax shelter activities are oil and gas extraction, the largest single industry in mining, and equipment rental and leasing, the largest single industry in the business services category. Oil and gas extraction involves partnership ventures whose results are often highly speculative for all concerned, while equipment leasing usually involves the purchase by a partnership (often using borrowed funds) of equipment for use by a lessee, with attendant benefits to the partnership, the partners,

and the lessee.

The receipts and profits of these three activities are given below, for 1980 and 1979, and for 1974, for comparison purposes.

1974 (Amounts	1979 In bil	
312 522.8 -3.5 2.5 -6.0 12 \$2.2 -0.3 0.7 -1.0	-1.4 7.0	-3.3 8.1
8 \$0.6 -0.2 0.1	18 \$1.8 -0.2 0.4	20 \$2.2 -0.3 0.4 -0.7
	12 \$2.2 -6.0 12 \$2.2 -0.3 0.7 -1.0	12 24 \$2.2 \$6.0 -0.3 -2.5 0.7 2.5 -1.0 -5.0 8 18 \$0.6 \$1.8 -0.2 -0.2

In past years, other popular tax shelters associated with partnerships have included cattle breeding and feeding; production, holding and distribution of motion picture film or television tapes; exploration for specific minerals and natural deposits other than oil and gas; and the development of certain tree crops.

Tax shelter activities often involve use of the partnership form of business. Promoters of specific business ventures often find that the partnership form facilitates the raising of capital (usually obtained from wealthier individuals) for projects that entail some extra degree of risk, but where the rates of return to the investing partners are potentially high in terms of profits and income tax reductions. Also, partnerships are not taxed directly; their profits and losses are passed through to the partners instead [5]. Thus, returns to the partners take the form of shares of the partnerships' profits and losses and, in addition, of any percentage depletion and capital gains or losses, guaranteed payments to partners and other tax benefits, such as the potential for investment tax credits. In general, partnership losses that are deductible by partners are limited (except when they result from the holding of real estate other than mineral property) to the amounts for which partners are individually liable, their so-called investment "at risk." By borrowing, individual partners can generally increase the size of their investment "at risk" to the advantage of both the partnership(for which it means increased capital) and of the partners (for which it means increased interest deductions). Moreover, in the case of limited partnerships, additional capital may also be raised by partnerships borrowing in their own right. Since losses are deductible to the partners, increases in partnership indebtedness allow partners to increase their share of any losses beyond that for which they are individually liable based on their investment contribution to the business.

OTHER INFORMATION

Following tables 1 and 2 is a brief discussion on the sources of the data and their limitations, as well as the notes and references that go along with the

Table 1.—Business and Selected Other Receipts, Deductions, Net Income, and Inventory, by Industry [All figures are estimates based on samples—money amounts are in thousands of dollars]

Industry	Number of perfinerships	business receipts1	Rents	sales and operations	payments to partners	Depreciation	Amortization	Rent paid	psid	Bad debts	Net income less deficit	Net	Deficit	Inventory (end-of-year)
	ε	(2)	(3)	(4)	(2)	(9)	(2)	(8)	<u>@</u>	(3)	(11)	(12)	(13)	(\$
All industries.		285.967	1.179.617	113 885 66R	4 748 95°		696 663							
All nonfarm industries	·-		1,029,919	101,326,901	4,541,722		582,102					45,061,756		14,689,960
Agriculture, torestry, and fishing		21,610	158,386	13,725,017			2,081					2.538.830		603 964
Farms, total		19,173	149,698	12,558,787			1,251					2,239,110		548 982
Vegetable and malon		5,648,618	72,783	3,747,898			176					1,045,390		139,032
Fruit and tree nut		1.321.727	14,093	7429,518			16					76,342		172
Horticultural specialty		316,008	1,422	173,045			103					34 662		29,045
Beef cattle, except feedlots	1,412	938,289	6,273	830,939	2,810	23,399	12	24,986	40,106	.200	-27,860	30,554	58,414	83,950
Hogs, sheep, and coats.			136.10	3,009,4447			ZI.					358,392		229,644
Dairy farms	٠	3.355.153	8.367	2 095 290			e:					54,409		10,409
Poultry and eggs.			1,125	391,509			= 1					366,192		30,843
General Investock, except animal specialty		230,659	1,556	181,204			Ī					27.119		13.038
Animal specially	2,288	98,347	.903	59,029			ů					14.573		1.456
Agricultural sarvices	•	11,764	1,214	4,684			1					1,691		*241
Veterinary services		92864	0,22,0	90,00		110,779	226					212,571		42,861
Livestock breeding		210,012	7,00	153.410		20,00	9					105,088		7,032
Animal services, except livestock breeding and veterinary		88,121	174	55,939		12,000	ا ه				- 58,553	16,380		1,585
Landscape and horticultural services		269,994	*746	136,851		13,382	•360				22,072	24,032		7,083
Curer agricultural services		869,514	3,849	209,600		36,735	•16				14,034	53,508		25.771
Foresty Figure 2 and transfer		219,616	799	95,646	7,114	21,620	*275			783	- 14,181	27,532		1.630
Marie and the second se			9		16,140	62,431	œ				869	59,617		10,691
Management	<u>"</u>	13,200,878	44,840	4,200,658	113,427	1,276,019	58,986	202,316			- 4,208,334	3,919,568	8,127,902	214.557
Metal mining		1,682,824	.542	874,024	4,053	211,493	.4,483	23,497		151	-203,740	153,715	357.455	71.816
Oil and das extraction	2,120	1,702,360	4,438	947,459	13,696	149,546	44,102	24,825		•323	-265,551	124,670	390,221	31,200
Nonmetatlic minerals, except fuels.		563 703	38,010	2,042,253	91,458	869,425	10,094	133,879	475,083	2,421	- 3,693,856	3,577,178	7,271,034	71,949
Construction		1000	2	220,000	r F	40,000	8	611,05		4443	- 45,186	94,000	109,192	39,592
General building contraction and constitut building		3	93,675	13,131,438	341,987	357,997	11,235	117,849		17,343	1,560,093	2,119,434	559,340	1,626,366
General building contractors		1043,769	71,428	7,455,455	123,885	85,706	9,778	32,895		2,212	715,661	1,006,011	290,350	1,449,816
Operative builders	1 032	1,870,030	200,44	6,319,175	578,701	69,414	6443	23,391		1,844	503,985	742,459	238,474	1,083,512
Heavy construction contractors	3.638	6	A80 8	2 740 000	90301	10,00	0,330	50c'a		399	211,676	263,553	51,876	366,304
Highway and street construction	1,448	811,815	2.22	618.447	6,295	27,690	38	6 57B		00,00	00000	309,210	2,071	46,651
Heavy construction, except highway		χį	6,062	2,121,561	7,300	66,753	153	19,645		1.982	99,634	245 933	146 200	0,77
Special trade contractors	.,	5,311,359	13,963	2,934,743	204,507	176,516	699	58.181		12.442	696 557	705 173	08.817	42000
Prumbing, negarity, and air conditioning.		790,389	1,060	526,701	44,807	13,639	ē	4,424		2,306	71.265	83,359	12,094	31947
Electrical work	3,885	259,104	2,352	125,481	17,888	6,611	T	2,244	2,139	127	56,150	59,519	3,369	*614
Masonry, stonework, tile setting, and plastering.		742,542	782	382,774	22 666	9,139		2,743		421	101,817	104,421	*2,604	43,163
Carpentering and flooring		451.046	0 0	202,57	22,003	9,2,61	•	0,820		3,496	114,699	141,342	26,643	12,242
Roofing and sheet metal work.	1.480	283.928	571	158,000	208,80	009'01	203	5,567		986	87,748	89,762	*2,014	10,036
Concrete work	2,573	396,136	.620	220,311	21.651	20,00	•	2,4		1,720	45,006	46,578	1,572	6,524
Water well drulling	Ş	108,657	14	43,102	3,408	6,262	8	1,125		38	22.196	23,45	996*	787.6*
miscellarieura special uade contractors	10,591	1,704,927	2,049	881,571	54,817	85,297	173	29,432		3,545	169,969	208,575	38.606	19.571
Contractors from discognition	.283	14,299	i	1,232	ľ	1,332	-602	•550		1	£0,6°	.9,039	1	.286
Manufacturing	30,086	15,326,978	22,392	11,443,875	158,553	763,980	6.293	197.053		19.473	-472.049	1 199 nza		4 584 849
Food and kindred products	1,435	1,929,021	1,134	1,517,283	9,868	42,728	828	8.987	40,039	1.534	33 543	71 640		187.48
Annaral and other tavilla products	395	242,727	181	186,102	.877	4,939	1	2,604	5,215	618	12,762	15.428		43.109
Lumber and wood products, except furniture	1,884	483,097	4.5	324,369	8,908	5,817	60	6,805	4,281	2,436	38,592	45,845		48,002
Furniture and fixtures	1,06,1	188,809	9,10	119.486	1 968	93,288	.288	21,461	45,995	888	8,875	109,595		120,408
Printing, publishing, and allied industries	7,157	1.113.452	3.402	450 821	500	104 075	,	600,60	, 6 4	483	20,224	27,256		20,681
Chemicals and allied products	424	3,213,352	154	2.749.221	1,182	314 627	460	27,906	26,484	2,872	37,350	197,628		42,824
Stone play and glass products.	-288	.58,808	.9	•39,150	1,806	894	1	*559	304	2	*6.875	•7.183		4,430
Primary metal industries	25.5	670.317	4,625	170,338	3,843	12,756	N.	2,579	5,575	618	31,905	32,560		17,461
Fabricated metal products.	3 188	R28 773	1 5	193,000	0,94	0,000	/ -	96,79	10,8	830	76,836	88,243		58,898
Machinery, except electrical	1,648	795,827	•173	593,767	15,377	14.930	, c	13,700	13,479	1,457	94,732	118,072	23,340	133,704
Electrical and electronic equipment	8	344,775	69.	239,402	1,121	13,368	.248	13,909	8,974		- 61.050	17,994		118,688
Other manufacturing industries	4 650	3 479 626	2075	56,221	1,099	2,032	N Ç	*1,532	1031	*371	20,837	24,593		11,429
Manufacturing not allocable	<u>.</u>	6.851	2	4.565	0 / 0	280,87	1,140	30,490	49,181	2,513	- 254,783	235,528		323.240
		-												

Table 1. — Business and Selected Other Receipts, Deductions, Net Income, and Inventory, by Industry — Continued

All figures are estimates based on samples—money amounts are in thousands of dollars.

				Cost of	Guaranteed		T				T			
Industry	Number of partnerships	Business receipts ¹	Rents	sales and operations	payments to partners	Depreciation	Amortization	Rent paid	Interest paid	Bad debts	Net income less deficit	Net income	Deficit	Inventory (end-of-year
	(1)	(2)	(3)	(4)	. (5)	, (6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Transportation, communication, electric, gas, and sanitary	ľ i													ŀ
services	20,417	5.868.413	13,718	2,196,295	78,572	892,623	8,168	101,629	389,011	10,592	248,387	1,092,415	844,029	18,7
Local and interurban passenger transit	1,238	85,931	668	22,005	6,557	11,206	_	*1,741	4,193	•7	578	4,803	4,224	•
Taxicabs	*124	*9,658	*171	*6,261	*958	467		•2	*336	· -	*- 36	_	*36	
Other passenger transportation	1,115	76,272	*497	*15,744	*5,598	10,740	1 -	*1,739	3,857	•7	614	4,803	*4,188	
Trucking and warehousing	10,777	1,678,380	5,692	359,005	45,938	167,098	808		85,287	2,020	116,415		58,459	
Trucking, local and long distance		1,422,826	3,251	305,177	43,596	129,400	*522 *286		40,678	1,627 392	87,681 28,734	131,802 43,072	44,121 14,338	3,5 *2,6
Public warehousing and trucking terminals	1 1	255,554	2,442	53,829	2,343	37,698	82		44,609 105,014	592		111,045	113,907	4.2
Water transportation	1,343	567,418 74,881	*4,192 *198	215,928 *8,269	4,661 *610	133,313 55,665	*29		26,520	ි (ච	- 69,893	*2,404	72,297	3
Air transportation		2,033,547	*672	1.076.078	9.787	211,542	393		59,937	1,266		547,175	123,676	
Passenger transportation arrangement		438,756	*670	307,425	4,749	4,391	*381		5,401	436		*10,413	7,461	*1
Freight transportation arrangement	356	76,229	_	*28,878	*1,457	5,314	*4	*380	2,516	*152		16,473	*3,951	
Other transportation services	679	1,518,562	2	739,775	*3,581	201,837	8	9,118	52,021	678		520,289	112,265	
Communication	1,811	504,942	1,094	102,523	6,559	105,970	5,409 309		59,997 41,023	6,146 *284	- 32,109 - 224,743		132,648 336,030	
Electric, gas, and water services		694,217 229,096	*239 *963	354,904 57,582	*3,155 *1,304		1,138		7,041	*277	37,502		*2,787	77
Sanitary services	1 1	•			1 '						1 1 1	1	899,705	
Wholesale and retail trade		65,793,083	124,795		729,754	718,292	18,897		631,344	98,683	2,474,626			
Wholesale trade		28,426,030	33,262		178,331	184,558	1,602			38,594 3,432	912,899 65,823	1,133,269 70,762	220,370 4,938	
Motor vehicles and automotive equipment	2,645 1,353	827,088 784,279	1,162 2.364	580,760 609,075	19,109 10,954	8,613 19,240		11,395 4,532	11,314	2,458	26,113		9,382	
Lumber and construction materials		308,549	2,304 *678	229.663	7,956	3,687		4,816	1,914	549	- 1,786		*31,731	
Electrical goods		321,588	*324	225,874	4,229	2,205	1	4,069	5,787	2,632			*6,705	38,8
Farm machinery and equipment		737,166	2,947	592,337	7,681	6,950	*1	3,243	11,139	966	43,598	48,238	4,640	191,7
Other machinery, equipment, and supplies		902,774	5,093	637,224	15,210			8,961	11,592		66,039		12,894	
Other durable goods	5,939	3,067,143	4,651	2,603,676	28,496	22,771	*205		25,004	3,055			28,107	
Drugs, chemicals, and allied products		496,644	*1,496	414,964	*8,275		*24	2,539	2,354	293		21,315 40,124	*3,284 19,872	
Apparel, piece goods, and notions	1,960 3,178	620,570 3,405,877	*171 3,233	420,655 2,931,796	6,571 21,943	3,226 21,780	97		27,536 15,823	2,753 3,171	20,252		20,452	
Groceries and related products		3,435,418	644	3,191,745			*284			3,520			25,676	1 '
Farm-product raw materials	1,577 662	926,909	*374	783.006			*291		4,388				*2.071	57.3
Other nondurable goods	6,177	12,482,779	9,991	11.633.536	28,819		637			13,849			50,548	
Wholesalers not allocable	239	109,248	*132	91,878		1,035	*1	*1,121	. 930	*6	6,783	6,853	*70	*4,8
Retail trade	167,826	37,307,313	91,533	26,502,456	551,065	533,502	17,295	988,203	433,155	60,050	1,557,947	2,236,195	678,247	3,830,0
Building materials, paint, hardware, garden supply, and mobile	'						i			i	l			
home dealers	7,215	2,273,154	8,416				, 294	30,007	36,429				40,409 18,544	
Lumber and other building materials	2,469 1,006	1,025,334 138,022	2,702 351	740,342 83,560	12,498 *4,855	19,042 1,993		7,079 4,887	15,182 1,305	4,997 *260			*742	
Paint, glass, and wallpaper stores	2,482	728,281	2,231	491,226	25,862			13,786		2,586			11,082	
Retail nurseries and garden supply stores		191,218	410	124,234	3,694	4,979		3,070		*214	5,781	12,781	*7,000	20,9
Mobile home dealers		190,300	*2,722	154,571	*686	2,359	1	1,186	8,674	*16	.,,		*3,041	
General merchandise stores	2,710	784,441	2,586		11,085	7,855	*31			1,271	33,879		13,806	
Variety stores	743	198,767	669		1,905					*23			*4,060	
Other general merchandise stores	1,967	585,674	1,917	435,478	9,181	5,907	.*17	9,895	6,955	1,248	1 1 1		9,746	1
Food stores	20,535	7,341,731	12,937	5,877,772									52,127	
Grocery stores		6,014,586	10,469			54,437	685					249,575	27,316	
Meat and fish markets, including freezer provisioners		637,132	*230	504,787 101,992						208			3,412 *4,379	
Fruit stores and vegetable markets		131,921 44,478	*428		*88					۱ ۲	- 2,024		*6.55	
Dairy products stores		133,214	97		*778				3,294	1142			3,533	
Retail bakeries		176,903	*552		6,699			6,894	2,003				*3,28	
Miscellaneous food stores	1,432	203,496	*1,160	141,007	4,185	3,476	*99	. ,	2,634	*133	1 1		3,640	
Automotive dealers and service stations			12,892										101,40	
Motor vehicle dealers - new car dealers (franchised)		1,936,047	3,900										27,686	
Motor vehicle dealers - used cars only		821,008	1,033		11,287		*18						11,881	
Auto and home supply stores		803,027	*748		20,164		170 521		11,071 22,573	3,055 6,763			15,540 22,580	
Gasoline service stations		5,946,756	6,655						1	0,703			19,35	
Boat dealers		109,738 *68,540	*168	74,873 *55,588				4,033 *1,548			- 16,43 1,56		19,35	
Recreational vehicles		139,081	1 .45	112.946				1,546	3,341					
modicycle dealers	574	145,897	*343				*36							

Table 1. — Business and Selected Other Receipts, Deductions, Net Income, and Inventory, by Industry — Continued

[All figures are estimates based on samples-money amounts are in thousands of dollars]

Industry	Number of	Business	Rents	Cost of sales and	Guaranteed payments to	Depreciation	Amortization	Rent paid	Interest	Bad debts	Net income	Net	Deficit	Inventory
	partnerships (1)	receipts ¹	(3)	operations (4)	partners (5)	(6)	(7)	(8)	paid (9)	(10)	less deficit (11)	income (12)	(13)	(end-of-year)
Wholesale and retail trade — Continued	'''	(2)	(3)	(4)	(3)	(0)	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	(0)	(0)	(10)	(1.7)	(12)	(10)	
Retail trade — Continued												İ		
Apparel and accessory stores	14,606	1,831,703	8,176	1,187,547		22,856		90,874	25,455	5,686	63,234	141,567	78,333	480,392
Men's and boys' clothing and furnishings stores	1,764 3,945	333,507 370,173	*1,963 *1,190	210,119 240,586	14,298 8.823	3,925 6,302	*761 *156	12,133 24,255	5,696 5,294	1,447 298	13,322 - 8,450	23,336 24,099	10,013 32,549	91,633 79,805
Women's accessory and specialty stores	852	126,471	· —	84,373	*2,846	975		8,522	*521	*99	7,455	9,660	*2,204	23,538
Children's and infant wear stores	872	97,165	*61	63,377	*1,386	836	-	6,635	1,768	*205	1,766	6,792	*5,026	24,075
Family clothing stores	1,641 2,145	338,729 282,308	*765 *3,222	219,633 180,581	12,390 10,920	3,312 3,760		11,914 14,098	3,622 3,726	2,746 573	18,724 13,179	25,249 20,588	6,525 *7,409	113,465 70,676
Shoe stores	*333	*20,256	_	*14,795	· -	*72	<u> </u>	*327	*84	•3	*4,099	*4,101	*2	*1,652
Other apparel and accessory stores	3,055	263,094	*975	174,084	4,209	3,674	12	12,990	4,744	314	13,138	27,743	14,605	75,548
Furniture and home furnishing stores	12,013 3,723	1,899,710 817,656	6,416 824	1,198,634 487,928	49,014 14,979	23,078 9,773	*329 *193	64,371 28,961	23,926 15,926	7,861 5,077	147,056 69,558	180,639 85,658	33,583 16,100	356,338 171,711
Furniture stores	1,462	291,798	*1,341	193,741	9,653	4,143	*96	5,596	2,809	859	22,823	27,781	4,958	49,104
Drapery, curtain and upholstery stores	1,118	48,530	*14	27,818	127	*706	_	3,533	*371	*148	5,602	6,239	*637	2,758
Home furnishings and equipment stores, except appliances	1,671	164,995	*157	103,846 152,385	*3,001 5,278	1,659 2,648	-40	7,187 5,521	468 1,618	*311 395	7,402 14,725	9,271 19,333	*1,869 4,607	23,039 44,146
Household appliance stores	1,635 1,252	222,064 193,777	*2,648 *259	125,066	13,313	2,040		6,047	1,888	431	13,639	17,047	*3,408	29,964
Music stores	1,152	160,889	*1,173	107,851	*2,664	2,131] -	7,526	847	*640	13,307	15,310	*2,003	35,616
Eating and drinking places	37,284 29,056	6,822,320 6,073,396	27,887 21,457	3,280,649 2,907,327	101,871 85,046	200,359 175,626	9,442 8,761	378,096 349,711	120,647 101,013	3,409 2,802	241,940 187.956	473,457 405,256	231,517 217,300	129,382 107,497
Eating places		748,924	6,430	373,322	16,825	24,733	*681	28,385	19,634	607	53,984	68,201	14,217	21,885
Miscellaneous retail stores	50,878	6,341,011	12,139	4,343,487	131,636	97,217		201,623	76,104	11,507	395,972	523,044	127,072	1,045,508
Drug stores and proprietary stores	2,581	721,887	3,249	485,617	30,599	5,897	*44 1,361	15,427	3,599 13,256	1,941 1,745	66,314 57,175	67,655 67,111	*1,342 9,936	113,868 109,702
Liquor stores	3,347 4,632	1,271,121 307,304	1,785 *1,687	1,002,537 181,543	13,970 *6,966	14,673 4,807	1,361	23,056 18,075	5,563	*423	57,175 23,727	37,620	13,893	85,872
Sporting goods and bicycle shops	3,370	346,629	*566	227,519	6,847	4,866		7,958	7,581	518	22,603	29,670	7,068	87,702
Book stores	2,015 364	120,348 115,090	*525 *30	75,868 71,763	*3,306 *1,610	1,391 2,570		5,695 5,654	*771 961	*84 *75	11,021 4,769	12,641 5,282	*1,620 *513	31,821 21,592
Stationery stores		308,636	*227	168,383	*3,473	2,570 4,081	1 −₄	5,65 4 12,812	4,709	1,388	36,660	5,282 44,180	*7,520	109,908
Hobby, toy, and game shops	2,431	131,253	*59	96,203	1,205	1,828	-	7,839	1,318	*578	4,082	9,474	5,391	23,538
Camera and photographic supply stores	570 5,362	71,629 374,125	*537	50,279 228,623	*1,933 6,891	1,036 6,538		*2,549 29,528	*538 4,807	*155 799	2,637 28,019	*4,567 37,896	*1,930 9,877	8,765 96,190
Sewing, needlework, and piece goods stores		117,689	*85	66,844	*14,005	1,363	E .	6,998	1,645	_	7,389	8,624	*1,235	34,364
Mail order houses	1,973	219,665	46	148,978	2,304	749		1,560	349	364	26,046	29,530	3,484	15,068
Merchandising machine operators	1,486 1,520	97,712 27,648	*349	61,889 14,550	*1,756 —	6,478 *593		2,017 *835	1,208 *100	*49 —	5,438 - 3,095	6,806 *1,780	*1,368 4,875	4,816 *3,466
Fuel and ice dealers, except fuel oil dealers and bottled gas				·							·			
dealers	*145 351	*39,238 267,629	*26 *329	*32,380 234,346	*293 2,148	*213 1.826		*155 1.093	*39 1.021	— 429	*3,053 9.068	*3,387 9.936	*334 *868	*336 12.212
Fuel oil dealers	*261	*57.683	*2	*45.217	2,148	*2,050		*340	*619	*83	*1,986	*3,278	*1,293	*5,879
Florists	3,444	351,382	*163	186,749	4,867	7,366		13,507	5,362	576	30,559	35,677	5,118	22,394
Cigar stores and stands	*107 *631	*28,820 *30.937	_	*18,073 *24,506	*36 *1,089	*1,770 *182		*310 *564	*64 *329	<u>(</u> එ	*2,723 *439	*2,723 *999	*560	*1,256 *9,304
Other miscellaneous retail stores	11,906	1,334,587	2,475	921,620	27,860	26,941	*369	45,650	22,263	2,299	55,359	104,207	48,848	247,455
Retail trade not allocable	*144	*43,147	*83	*34,422	*91	*421	_	*256	*216	*177	*4,078	*4,078		*10,672
Wholesale and retail trade not allocable	*53	*59,740		*45,541	*358	*232	1	*927	*269	*39	*3,779	*4,867	*1,088	*9,955
Finance, insurance, and real estate	1 ' 1	87,133,197 23,379,400	457,584 130,440	8,979,661	1,079,628 462,900	11,608,309 399,447		1,341,338	21,549,095 4,284,605	135,279 48,149		15,169,488	19,418,264 7,964,446	4,174,539 212,008
Finance	314	23,379,400	2,326	33,971	1,812	*5,439		196,038 *5,123	48,516	*639	- 1,436,934 55,011	6,525,512 *56,636	*1,624	212,008
Credit agencies other than banks	2,114	210,609	*1,591	*771	7,204	2,918	182	6,295	43,688	5,297	31,004	47,084	16,079	_
Security, commodity brokers, and services	2,069 187	12,663,076 1,982,271	3,167 797	*13,570	229,043 *11,880	17,473 864		*92,730 22,186	1,449,102 27,521	*8,120	- 479,077 127,649	591,207 131,300	1,070,284 3,651	1,748
Security brokers and dealers, except underwriting syndicates		9,911,662	*568	5,320	206,760	12,542	1,557	62,614	1,371,323	6,873	- 461,447	365,889	827,336	=
Commodity contracts brokers, exchanges, and services	610	769,143 10.286,722	1,802 123,356	*8,250		4,067		7,930	50,258 2,743,300	1,238 34,093	- 145,279	94,018	239,297 6.876,459	1,748 210,260
Holding and investment companies Investment clubs	161,471 11,399	34,439	123,356	*19,630 *35	224,842 732	373,616 1,568		91,891 *145	2,743,300 4,327	34,093	- 1,045,873 - 43,341	5,830,586 20,016	63,356	210,260
Common trust funds	2,365	2,779,693	*481	_	23,118	868	*11	13	29,686	*39	2,682,767	2,696,420	13,654	
Other holding and investment companies	147,707	7,472,590	122,271	19,595		371,180		91,733	2,709,287	34,054	-3,685,299	3,114,149	6,799,449	210,260
Insurance agents, brokers, and service		3,116,599 60,637,197	6,900 320,244	562,009 8,383,681	64,936 551,792	18,877 11,189,986		44,761 1,100,539	14,365 17,250,125	15,941 71,188	477,313 - 3,287,155	519,307 8,124,669	41,994 11,411,824	3,962,531
Operators and lessors of buildings	390,946	47,236,116	97,092	905,929	383,826	10,773,849	240,312	986,078	15,571,594	61,632	- 3,898,031	6,097,003	9,995,034	383,921
Lessors, other than buildings	30,689 19,043	1,065,132 2,985,239	18,734 71,503	143,922 1,133,669	6,430	152,823 145,349	1,899 5,205	20,846 56,607	230,357 366,359	611 2,726	194,614 76,110	412,475 421,213	217,861 345,103	127,355 371,688
Title abstract companies		*13,670	71,503	1,133,008	75,002 *571	*741		*75	*250	2,720 *8	*5,404	*5,404	345,103	3/1,008
Subdividers and developers, except cemeteries	23,106	9,302,727	131,688		85,140	115,420	46,553	36,288	1,072,530	6,041	339,592	1,185,317	845,726	3,076,023
Cemetery subdividers and developers	*84 399	*21,328 12,985	*1 *1,225	*3,949 *773		*1,00€ *797		*366 *278	*6,512 *2,522	*171	*- 6,243 *1,399	*275 *2,981	*6,517 *1,582	3,521 24
Footpotes at and of table	1 389	12,500	1,225	1/3	ı ′°	l '8'	1 3	اً دروا	2,522		1,389	2,001	1,502	64

Footnotes at end of table.

[All figures are estimates based on samples-mon	by amounts are in thousands of dollars]
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Industry	Number of partnerships	Business receipts ¹	Rents	Cost of sales and operations	Guaranteed payments to partners	Depreciation	Amortization	Rent paid	Interest paid	Bad debts	Net income less deficit	Net income	Deficit	Inventory (end-of-year)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Services	263,400	58,626,801	264,248	8,714,538	1,981,433	4,137,512	136,842	2,567,463	2,478,040	94,358	12,424,161	15,648,612	3,224,451	661,461
Hotels and other lodging places	16,040	7,014,224	87,137	1,391,844	67,821	763,095		211,639	942,425	19,116		697,903	709,303	82,707
Hotels	2,117	3,321,031	47,062	841,898	18,271	328,378		81,009	431,157	9,767	- 134,344	275,497	409,841	35,190
Motels, motor hotels, and tourist courts	8,084	3,109,649	38,131	492,056	37,889	338,658		109,963	404,020	6,422 *31	129,933	344,407	214,475	36,134 5,416
Rooming and boarding houses	1,192 737	107,510 49,281	889	*17,778 *4,222	*819 *1,691	10,919 5,975		8,955 *3,095	11,279 *4,056	*2	-9,148	11,606 *1,482	11,476 10,630	*420
Trailering parks and camp sites	3,444	372,654	*943	28,934	8,695			6,862	84,473	*218	1,110	61,081	59,971	5.434
Organizational hotels and lodging houses, on a membership	0,111	. 0.2,00	. 040	20,00	. 0,000	. 0,00 1			0.,		',			1
basis	465	54,099	*112	6,957	456	3,832	3	*1,756	7,439	2,675	919	3,830	*2,910	115
Personal services	25,607	1,661,812	9,727	372,184	102,997	81,303		111,711	32,935	6,150		281,302	58,463	29,037
Coin-operated laundries and dry cleaning	. 2,609	174,872	*3,573	38,838	*6,296			15,721	7,876	*10	14,581	19,319	4,737	614
Other laundry, cleaning, and garment services	. 4,005 1,256	350,160 81,440	*1,302 *49	70,949 23,245	12,800 *3,679			20,083 1,853	6,490 *463	513 *135	46,110 4,434	50,231 *7,792	4,120 3.357	3,389 *3,86
Photographic studios, portrait		387,982	*3,726	23,245 85,726	37,043	11,165	1 4	37.946	3,652	*49		58.411	12,122	4.02
Barber shops		111,448	*393	11,347	26,989	2,167		10,958	*720	_	27,746	29,633	1,887	44
Funeral service and crematories	.1 1.466	246.015	*242	76,400	8,857	9,873		4,891	5,174	3,116		59,837	*7,259	11,240
Miscellaneous personal services		309,894	*442	65,680	7,333	20,755		20,260	8,560	*2,327	31,100	56,080	24,980	5,45
Business services	51,277	5,256,460	42,925	957,534	161,762			134,259	695,471	6,837	63,531	1,167,958	1,104,427	74,12
Advertising	2,805	368,647	*541	160,969	19,120	8,791		13,660	6,071	*254	42,244	70,016	27,772	:42
Services to buildings		254,832		44,475	*13,323	8,305		2,985	2,505	*370 *119		76,631	104,849	*57- *4,14
Computer and data processing services	. 4,020 6.474	332,283 955,378	*124 5.117	72,142 132,263	6,093 58,857	144,546 24,116		9,127 30,225	22,041 16,430	*1,942		61,715 334,047	88,907 63,496	1,95
Equipment rental and leasing		2,163,580	34,107	145,171	22,681	1,528,442	1,521	40,760	503,195	2,160	- 305,585	429,154	734,739	48,04
Other business services		1,181,740	3,036	402,514	41,687	54,157		37,502	145,230	1,993	111,730	196,395	84,665	18,97
Automobile repair and services		2,415,045	11,109	1.088.780	83,380			96,919	109.627	6,588		317,730	120.021	84,64
Automotive rentals, without drivers	1,970	287,594	*2,513	27,429	4,611	109,931		8,810	56,365	1,722	20,841	23,266	44,106	2,22
Automobile parking	. 346	71,521	*2,132	*2,376	*996	3,132		24,506	10,447	*56	11,194	14,531	*3,337	1 *3
Automotive top and body repair shops	. 4,825	494,181	1,532	252,125	17,993			12,215	5,335	744	90,096	94,480	4,384	11,70
General automotive repair shops	. 7,983 2,783	820,336 307,211	1,832 *152	444,230 134,209	35,410 18,069	22,896 8,731	*130 *662	30,052 10,935	11,584 4,272	2,607 952	89,182 32,957	104,525 37,131	15,343 4,174	40,004 23,35
Other automotive repair shops	4.846	434,202	*2.948	228,411	6,300	26,385		10,400	21.625	506		43,797	48,677	7,32
Miscellaneous repair services.		809,444	*2,905	398,478	35,043		1 '	23,644	10,087	1,039		139,346	20,171	54.24
Radio and TV repair shops		91,441	2,505	43,706		2,717		4,310	1,879		13,995	14,829	*834	12,49
Electrical repair shops, except radio and TV	1,571	201,441	*14	107,680	*7,759			4,526	1,823	*610	23,870	30,272	*6,401	13,69
Reupholstery and furniture repair	. 1,948	85,948	*310	31,771	*4,412		. –	4,241	615			18,705	*1,455	1,88
Other miscellaneous repair shops		430,613	*2,581	215,320	13,697	15,409		10,567	5,769		1	75,540	11,481	26,17
Motion pictures		1,167,327	14,469	413,850	11,790				53,791	10,932		164,451	295,163	21,73
Motion picture production, distribution, and services		852,027 315,300	*606 13,863	280,807 133,044	7,477 4,313	386,190 9,779		18,063 40,658	48,229 5,562	9,108 *1,824		125,628 38,823	293,164 *1,999	18,40 3,33
Motion picture theaters										3,177				
Amusement and recreation services, except motion pictures Producers, orchestras, and entertainers		2,465,631 555,811	12,763 *750	613,472 182,093	48,025 15,484	206,572 5,290		130,814 29,915	146,871 3,551	*279	9,352 49,156	263,287 76,605	352,640 27,449	48,48 *1,17
Billiard and pool establishments		*3,102		*1.285	15,404	*141	1.00	*15	*165		-8	*33	*41	l ''•s
Bowling alleys		110,780	1,777	19,867	*3,945	8,737	*36	7,831	6,299	*48	3,531	5,969	2,438	1,64
Professional sports clubs and promoters	. 232	226,210	*137	40,461	*3,440				24,349	193		18,180	80,056	*78
Racing, including track operation	. 4,998	170,740	*1,485	50,606	*1,628			9,203	5,544	*224	+ 40,933	24,293	65,225	*10,30
Other amusement and recreation services		1,398,988	8,614	319,160	23,528				106,963	2,432	39,221	138,208	177,430	34,52
Medical and health services	. 23,241 10,272	9,581,687 5,578,657	24,017 5,645	530,235 62,480	304,124 205,184			470,312 276,583	147,238 22,098	20,242 3,955		3,159,782 2,372,292	122,292 7,433	9,81 77
Offices of physicians		764,547	1,943	39,806	205,184 45,951			276,563 41,458	12,096	*504	2,304,859	2,372,292	25,917	•33
Offices of osteopathic physicians		*48,812	.,5-0		1 .5,551	*165		2,691	*22		28,520	*28,520		1 =
Offices of chiropractors	. 441	*43,808	*657	*1,716	- ا	*2,142	<u> </u>	5,947	*1,153		16,502	*16,502	_	-
Offices of optometrists	. 1,724	262,213	*285	76,361	13,150	4,788	*282	11,210	2,076		1 1 '	91,961	*2,026	4,02
Registered and practical nurses		_		_		-	-		*935		- 1,013		*1,013	1 -
Nursing and personal care facilities		1,360,121	7,780	216,770	12,855				71,929			60,782	29,459	
Hospitals		614,688 339,329	5,460	*36,176 32,161	*2,990 *5,207			16,339 16,217	20,198 5,629	6,199 *346		39,370 102,319	14,350 *15,478	51 *83
Medical laboratories Dental laboratories	763	68,032		16,536	5,207	1,639		2,699	*293] 346	25,956	27,617	13,476	*62
Other medical and health services		501,477	*2.245		18,786			29,908	10.828	*464		147,212	24,955	2,22
Legal services	. 29,524	14,125,458	31,529	122,121	362,743	222,170		814,309	75,977	10,252	6,596,160		38,219	ı -
Educational services	. 3,448	148,569	1,652	10,529	10,496	5,529	*117	5,794	3,293	*36	34,127	38,986	4,859	*38
Engineering and architectural services	. 6,675		2,282		129,726			85,277	16,757	2,173		457,569	10,496	
Accounting, auditing, and bookkeeping services	. 13,011	7,077,452	*6,046		567,207				62,654	4,705		1,696,677	23,968	
Certified public accountants Other accounting, auditing, and bookkeeping services	. 8,228 . 4,783	6,583,430 494,022	3,238 *2,808		495,151 72,057			303,220 25.044	55,409 7,245			1,592,573 104,104	20,383 3,585	*2,38
Other services		4,025,504	17,687		96,322				180,915			629,243	364,429	244,28
	1	1,525,507	l,507	.,551,501].]	55,550	.00,010	1	1 1		*1,000	
Nature of business not allocable	. -107			_		<u> </u>					*- 1,000	_	-1,000	

^{*}This estimate should be used with caution because of the small number of sample returns on which it was based.

Total receipts for industries in Finance, insurance, and real estate, and business receipts for all other industries. Total receipts is the sum of business receipts from investments.

*Less than \$500.

NOTE: Detail may not add to total because of rounding.

Table 2. — Sole Proprietorship Businesses: Business Receipts, Selected Deductions, and Net Income, by Industry.

[All figures are estimates based on samples-money amounts are in thousands of dollars]

			Businesses w	rith and without	t net income					Busine	sses with net i	ncome		
Industry	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income (less deficit)	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All industries	12.701.597	505,884,882	25,796,183	10,102,834	16,241,787	41,985,964	55,449,987	8,215,438	408,732,113	15,343,781	7,528,124	8,087,257	33,160,406	80.306.493
All nonfarm industries	9,730,019	411,205,713	13,952,703	7,672,459	7,190,257	37,483,041	54,947,219		347,821,195	9,184,339	6,006,302	4,219,486	30,757,452	68,010,051
Agriculture, forestry, and fishing	3,279,306	101,112,780	12,531,688	2,563,754	9,291,334	5,390,911	1,279,306	1,622,531	66,026,208	6,497,750	1,618,709	3,996,650	3,136,497	13,727,448
Farms, total		94,679,168	11.843.481	2.430.375	9.051.530	4.502.923	502,768	1,448,432	60.910,919	6,159,442	1,521,821	3,867,771	2,402,955	12,296,442
Field crop		41,883,693	5,961,219	1,368,880	4,328,284	1,794,008	3,571,124	848 584	30,303,517	3,525,107	965,131	2,100,477	1,018,886	7,579,818
Vegetable and melon	61,785		220,448	74,976	126,986	293,850		24,509	1,901,741	131,538	47,357	51,738	181,365	311,268
Fruit and tree nut	89,184		273,990	103,434	212,726	507,908		33,366	1,487,562	106,682	50,159	68,497	249,470	428,252
Horticultural specialty	17,516		30,657	17,857	38,497	123,899		13,232	562,786	25,028	14,592	37,677	113,164	74,654
Beef cattle feedlots	10,257	1,602,234	54,814	6,453	134 042	58,425		2,183	488,321	9,218	1,297	19,771	8,799	29,189
Beef cattle, except feedlots	650,923		2,068,529	372,249	1,881,480	572,257	- 2,106,508		9,877,893	663,789	152,395	573,905	156,175	1,254,426
Hogs, sheep, and goats	253,718		764,912	104,789	602,912	144,450		85,469	4,058,581	342,540	63,251	239,688	56,071	569,947
Dairy farms	174,905		1,557,806	207,181	1,110,867	661,016		115,214	8,461,532	1,059,062	144,949	653,499	458,897	1,328,282
Poultry and eggs	43,028	1,659,879	206,253	25,363	134,458	142,601	- 36,560	16,359	1,040,176	87,698	15,797	46,919	97,522	122,841
General livestock, except animal specialty	85,579 83,610	3,978,456 858,845	249,522 197,798	39,983 25,070	253,895 101,760	54,022 80,870		16,174 18,515	1,617,910 402,878	74,717 40,838	14,561 6,181	43,342 11,800	15,048 22,427	165,692 74,467
Animal specialtyFarms not allocable	182,947	969,087	257,532	25,070 84,141	125,621	69,617	- 439,343	50,640	708.022	93,225	46,152	20,458	25,131	357,605
	2.549.510		11,450,072	1.957,846	8,774,810	4,422,204		1,097,216		5,867,992	1,103,609	3,724,124	2.332.030	9.932.942
Farms, operators only, total	954,930		5,678,493	976.358	4,102,730	1,753,438		542,426		3,297,318	611,335	1,970,988	982,340	5,533,902
Field cropVegetable and melon			205.068	67,189	123,586	293,155		19,170	1.841,457	127,926	41,494	51.676	181.354	282,155
Fruit and tree nut			270,286	102,554	210,264	502,285		32,080	1,450,705	103,999	49,337	67,140	244,157	409,669
Horticultural specialty	07,132	2,007,000	270,200	102,004	210,204	502,255	00,000	13,136	498,573	21,938	14,225	37,677	86,640	63,529
Beef cattle feedlots			••	•••	••	**	••	2,183	488,321	9,218	1,297	19,771	8,799	29,189
Beef cattle, except feedlots	650,974	19,864,100	2,052,384	365,769	1,876,745	570,062	- 2,145,905		9,783,321	657,797	146,959	572,832	154,201	1,205,269
Hogs, sheep, and goats	249,079	6,348,281	755,347	94,410	600,194	144,399	- 548.860	81,647	3,855,150	336,295	53,271	238,368	56,071	537,199
Dairy farms	174,165		1,555,904	206,710	1,110,213	660,768			8,455,157	1,057,214	144,480	652,880	458,683	1.327,561
Poultry and eggs		1,659,871	206,219	25,363	134,458	142,601	- 35,986	16,359	1,040,176	87,698	15,797	46,919	97,522	122,841
General livestock, except animal specialty	85,579	3,978,456	249,522	39,983	253,895	54,022		16,174	1,617,910	74,717	14,561	43,342	15,048	165,692
Animal specialty	81,749		195,964	24,576	101,760	79,528		16,877	401,390	40,838	6,181	11,800	22,427	72,980
Farms not allocable	140,440	599,792	198,538	31,004	88,446	66,149	- 485,904	23,841	393,628	53,035	4,673	10,731	24,790	182,955
Farms, landlords only, total	422,068		393,409	472,529	276,719	80,719		351,216	4,783,274	291,449	418,212	143,647	70,924	2,363,501
Field crop		4,204,542	282,726	392,522	225,555	40,570		306,158	4,001,661	227,789	353,796	129,489	36,546	2,045,916
Vegetable and meton	6,600	93,164	15,381	7,787	*3,401	*695		5,339	60,283	*3,612	5,863	*61	*11	29,113
Fruit and tree nut	1,992	37,963	3,705	881	2,461	*5,622	15,493	1,286 *96	36,857	2,683 *3,090	822 *367	*1,357	*5,313	18,583
Horticultural specialty		**	••[••	••	••		96	*64,212	3,090	367	_	*26,525	*11,125
Beef cattle, except feedlots	8.949	117,217	16,144	6,481	4,735	2,195	39,397	5,340	94,573	5,992	5,436	1.074	1,973	49,157
•		219,554	*9.566	*10,379	*2.718	*51	*24,997	*3,822	*203.431	*6.245	*9.980	1,320	1,373	*32.748
Hogs, sheep, and goats	1,039	*6,567	1,902	471	*654	*248			*6,376	1.847	*468	1,320 1619	*214	*721
Poultry and eggs	*485	*9	*33	-77	054	240	*- 574		0,570	7,047	400	013	214	(2)
General livestock, except animal specialty	_			_	_	_	_		_		l _l	_	_	_
Animal specialty	*1,861	*4,148	*1.834	*494	_	*1,342	*- 2,324	*1,638	*1,487			_	_	*1,487
Farms not allocable	42,507	369,295	58,995	53,137	37,175	3,468	123,395	26,799	314,394	40,190	41,479	9,727	*342	174,650
Agricultural services	214,066	4,861,885	483,167	104,154	189,358	673,825	572,651	125,086	3,996,486	260,665	78,967	112.895	563,769	1.004.691
Veterinary services	11,770	945,591	49,606	21,999	29,729	151,522	297,518		898,907	37,764	21,620	23,155	147,820	308,983
Livestock breeding	11,123	87,359	14,736	603	3,450	2,287	- 39,049	1,028	60,810	*782	*184	*58	*757	16,890
Animal services, except livestock breeding and veterinary	55,207	605,742	82,210	10,123	20,091	66,607	- 86,913		419,269	14,684	6,509	9,550	52,252	103,745
Landscape and horticultural services	96,436	1,820,176	157,424	42,770	45,543	253,259	324,798		1,536,220	103,846	30,818	26,237	196,019	396,451
Other agricultural services	39,530	1,403,016	179,192	28,660	90,544	200,150	76,297		1,081,280	103,589	19,836	53,895	166,921	178,623
Forestry	15,396	287,571	22,091	10,451	7,633	91,626	13		226,708	9,131	7,401	2,299	78,501	50,378
Fishing, hunting, and trapping	78,266	1,284,156	182,949	18,773	42,813	122,536	203,874	43,792	892,095	68,512	10,519	13,685	91,272	375,936
Mining	119,763	8,567,096	514,680	689,260	272,572	388,403	294,773	54,994	6,616,209	305,955	532,305	132,499	252,089	1,546,603
Metal mining	7,708	71,731	10.287	2.745	5.935	7,325			56,596	3.368	1.893	2,013	*485	13,530
Coal mining	3,640	785,635	68,645	23,090	16,050	136,836		1,529	537,302	39,742	16,291	8,015	79,429	54,651
Oil and gas extraction	105,127	7,536,124	417,819	656,042	244,646	221,291	431,474	50,867	5,896,052	252,701	508,691	120,431	160,121	1,453,028
Nonmetallic minerals, except fuels	3,288	173,606	17,929	7,383	5,941	22,951	- 9,704	1,761	126,259	10,144	5,430	2,040	12,053	25,394
		•	'	1			,		,		,	,		

Footnotes at end of table.

Table 2. — Sole Proprietorship Businesses: Business Receipts, Selected Deductions, and Net Income, by Industry — Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

figures are estimates based on samples—money amounts are in thousands of dollars]														
			Businesses v	vith and withou	t net income		Businesses with net income							
Industry	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income (less deficit)	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Construction	1,073,301	47,834,507	1,800,346	809,618	834,150	7,028,072	7,460,876	892,691	42.064.443	1,359,505	696,908	567.344	6,061,126	8,276,824
General building contractors and operative builders	226,326		405,704	235,558	360,009	2,114,842		168,703	14,108,279		187,378		1,772,329	
General building contractors	223,505		400,771	232,334	338,743	2,103,767		166,995	13,911,790	268,020	186,105		1,762,896	
Operative builders	2,821	268,454	4,932	3,225	21,266	11,075			196,488		1,272		*9,433	38,752
Heavy construction contractors	29,177	2,181,648	226,422	46,548	77,885	321,237	223,457	22,128	1,879,266	184,555	39,259	59,999	269,879	
Highway and street construction	. 8,718 . 20,459		116,999 109,422	26,051 20,497	36,014 41,872	194,541 126,696	83,935 139,522		980,742 898,524		23,338 15,920	31,984	173,102 96,776	
	773.446			502,480	369,296	4.258,112			24,974,136		452,270	28,015 272,435	3.777.368	
Special trade contractors	78,446		1,104,103	91,261	49,102	4,258,112			4,278,038		86,765	272,435 41,410	628,346	
Painting, paper hanging, and decorating	125,632		90,266	71,840	28,504	616,244			2,838,918		65,004	23,179	533,643	
Electrical work		2,605,145	78,969	57,446	25,629	409,837	, 380,153	43,631	2,310,836	61,801	49,710	20,179	342,739	424,649
Masonry, stonework, tile setting, and plastering	78,967	3,689,486	90,217	81,214	33,149	810,213	671,978	71,135	3,374,677	79,419	73,082	29,698	705,089	704,231
Carpentering and flooring	241,738		155,215	36,225	51,962	394,916		218,562	4,352,467	118,092	30,880	35,171	358,310	
Roofing and sheet metal work	43,169 14,623		49,052 42,809	20,581 20,218	11,812 10,868	275,877 187,071	332,916 155,776		1,621,501 889,464	39,548 38,813	18,340 18,839	9,316 10,360	248,148 178,138	
Water well drilling	8.509		46,188	8,996	9,952	49.801	81,860	7,149	532,345		8,301	8,707	46.245	
Miscellaneous special trade contractors	127,780		406,871	114,699	148,320	827,549		95,571	4,775,891		101,348		736,711	1,037,426
Contractors not allocable	44,352	1,458,861	64,117	25,031	26,960	333,882	1 240,636	37,306	1,102,763	38,465	18,003	18,830	241,550	271,304
Manufacturing	296,216	14,846,538	841,104	339,909	268,433	2,692,415	1,673,759	190,698	12,763,831	606,075	282,425	183,739	2,288,268	2,178,893
Food and kindred products	4,769	872,650	18,105	9,410	6,933	77,280	46,509	3,510	701,814	13,724	7,281	4,032	62.082	
Textile mill products	5,896		6,385	5,857	690	46,069	34,044	4,507	250,763	5,168	5,728	*618	44,962	
Apparel and other textile products		672,088	17,526	34,177	3,250	306,849		7,665	539,266		29,414	1,877	246,997	80,011
Lumber and wood products, except furniture Furniture and fixtures	. 73,976 6,033		355,957 ,9,173	92,359 4,222	117,505 3,534	666,177 62,750	392,040 26,469	53,882 4,259	3,559,475 323,988		77,132	83,524 3,146	561,090 55,971	506,280 35,329
Printing, publishing, and allied industries	53,985		125,260	59,653	30,940	442,545	402,769	33,865	2,422,380			22,943	419,523	4
Chemicals and allied products	2.268	119.857	9.236	1,454	2,233	6,239			84.571		719	*639	*4,020	
Leather and leather products	1,031	33,916	*914	*432	*759	*3,619		*91	*28,196		*197	*370	*2,846	
Stone, clay, and glass products	. 22,240	629,563	36,691	22,044	14,082	105,282			398,963		14,317	5,421	66,357	
Primary metal industries	1,384 16,126	181,956	5,559	2,016	2,562 11,481	26,033 144,950		451	156,050	1 1	1,764	1,937	19,541	23,468
Fabricated metal products Machinery, except electrical.	28,936	802,703 1,854,889	33,848 135,457	14,228 48,856	37,000	144,950 484,654	250.242	9,805 21,144	762,553 1,556,706		13,203 31,417	8,216 27,498	137,506 392,394	
Electrical and electronic equipment	7,181	260,023	19,271	3,640	8.848	43.093			211.634		2.302		35,480	
Transportation equipment	3,868		5,732	6,779	3,469	23,976			217,028		6,646	3,453	23,255	
Other manufacturing industries	51,478		56,907	34,333	24,612	252,891			1,499,008		31,562	17,729	216,235	
Manufacturing not allocable	5,269	60,834	5,086	*450	*535	*8	13,642	3,344	51,435	*905	*396	*222	-8	20,792
Transportation, communication, electric, gas, and sanitary services	438,795	19,965,525	1,864,611	502,961	636,785	1,767,043	1,995,557	306,484	15,607,625	1,178,554	365,822	381,342	1,274,147	2,737,117
Local and interurban passenger transit	43,315	1,045,595	78,834	25,844	21,248	158,953	159,259	34,422	825,747		20,787	15,913	105,435	
Taxicabs	26,937	487,631	25,483	11,121	5,431	62,133			402,900		10,533	5,031	61,531	106,493
Other passenger transportation	. 16,378 322,302		59,351	14,723 428,555	15,817	96,819			422,846		10,254	10,882	43,903	1
Trucking and warehousing Trucking, local and long distance	316,871	16,233,355 15,746,790	1,574,832 1,560,917	428,555	529,724 516,792	1,319,881 1,273,794			12,647,555 12,263,428		306,495 299,201	330,042 321,177	925,970 887,471	2,194,926 2,150,392
Public warehousing and trucking terminals	5,431	486,564	13,915	9,508	12,933	46,087	38,690		384,127		7,293	8,865	38,499	
Water transportation	11,776	4367,419	52,640	4,210	31,785	25,718			272,166		3,324	9,354	24,617	61,456
Air transportation	9,131	301,000	42,024	11,529	16,702	43,197	- 24,411	4,789	178,833	10,562	5,859	3,961	29,818	24,245
Transportation services	19,098	1,252,141	27,754	13,811	17,626	102,479			1,007,253		11,891	10,117	84,425	
Passenger transportation arrangement Freight transportation arrangement	11,356 1,719	790,524 255.020	5,273 7,484	6,995 3,203	6,648 4,264	65,684 14,897	43,473 30,954	7,070 1,465	614,430 232,694		5,783 2,796	4,586 2,247	55,709 13,682	
Other transportation services		206,597	14,996	3,203	6,714	21.899		4.381	160,129		3,312	3.284	*15.033	
Communication	5,512	124,902	26,435	2,821	5,408	21,207	- 3,131	2,785	99,638			768	17,334	
Electric, gas, and water services		139,960	6,384		*536	*5,135			136,795		*2,164	*499	*5,022	15,480
Sanitary services	25,046	501,154	55,708	14,027	13,757	90,473	61,980	12,246	439,638	39,041	13,232	10,687	81,527	87,665

Table 2. — Sole Proprietorship Businesses: Business Receipts, Selected Deductions, and Net Income, by Industry — Continued

[All figures are estimates based on samples-money amounts are in thousands of dollars]

			Businesses w	rith and withou	t net income			Businesses with net income						
Industry	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income (less deficit)	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Wholesale and retail trade	. 2,527,084	202,283,802	2,969,860	3,148,363	1,950,693	12,552,143	9,375,330	1,447,271	167,544,586	2,034,297	2,416,332	1,224,047	9,749,581	13,427,535
Wholesale trade	329,754	42.653.889	532,365	336,067	313,103	1,629,046	3,127,157	244,945	36,467,437	402,704	269,292	212,337	1.351,254	3,606,514
Motor vehicles and automotive equipment	14,709		18,516	12,968	14,619	133,878	135,214	10,429		13,008		8,947	122,701	152,357
Lumber and construction materials			23,012	10,706	12,897		81,196	8,120	871,640	17,053		8,542	44,966	
Electrical goods	7,807	653,135	13,169	5,469	12,366		53,355	5,557	468,128	7,067		3,640	25,699	68,750
Hardware, plumbing, and heating equipment	. 7,294 10,180	859,674 1,827,416	13,461 25,495	15,751 16,428	12,474 24,399		77,832 61,250		632,651 1,530,176	6,855 18,084		5,871 16,775	52,682 73,091	87,192 89,161
Farm machinery and equipment	1	2,712,292	56,128	33,937	33,158		339,315	20,464	2.489.937	45,480		25,644	143,294	370,919
Other machinery, equipment, and supplies Other durable goods			67,092	35,098	35,156	183,636	476,441	36,229	4,540,920	58,580		24,982	177,728	
Drugs, chemicals, and allied products	13,761	844,327	8,948	5,180	2,171		127,707	8,904	791.629	7,036		1,614	68,826	
Apparel, piece goods, and notions		733,923	8,897	4,420	4,599		139,342		652,843	5,636		3,794	7,733	148,896
Groceries and related products		7,482,198	85,643	44,568	31,983	341,102	388,068	29,382	6,914,838	76,151		26,926	317,000	412,649
Farm-product raw materials		5,998,199	40,886	10,967	35,144	49,060		5,957	4,362,813	24,826	7,895	20,750	34,572	103,823
Alcoholic beverages	2,114	499,186	5,218	5,863	2,522		35,479		460,742	4,742	4,792	1,816	27,425	36,167
Other nondurable goods	. 57,010		119,955	116,480	68,684	297,522	501,721	38,753	7,998,271	80,609		44,161	194,646	
Wholesalers not allocable			45,945	18,232	22,088		673,523	-	2,893,540	37,576		18,878	60,892	
Retail trade	. 2,066,267	153,814,591	2,322,072	2,744,076	1,574,571	10,537,410	5,687,993	1,121,838	126,048,217	1,555,767	2,094,526	973,098	8,077,016	9,076,116
Building materials, paint, hardware, garden supply, and mobile	60,000	6 046 006	110011	110 570	110 107	500 000	054 745	20.042	E 000 000		ا مد معما	00.040	405 440	
home dealers Lumber and other building materials dealers	. 63,032 . 9,082	6,246,826 1,351,495	119,614 26,343	118,570 28,713	119,167 21,897	538,232 110,445	354,745 54,889	39,843 6,115	5,089,890 1,023,054	81,998 19,259		63,046 9,147	435,448 81,101	523,809 90,795
Paint, glass, and wallpaper stores		491,326	20,343 8,615	7.183	5.057	52,106	42.628		475,500	7,892		4,964	51,098	
Hardware stores		2,239,281	32,894	39,198	45,492		129,743		1,798,757	21,813		25,009	152,606	
Retail nurseries and garden supply stores	22,411	1,301,371	35,267	25,420	19,837	147,709	75,559			20,327		7,154	119,204	120,650
Mobile home dealers	5,837	863,354	16,495	18,055	26,885	38,155	51,926	4,806	698,701	12,707	13,716	16,773	31,440	68,684
General merchandise stores	35,355	4,736,526	55,931	70,249	32,729	205,714	96,469	21,516	3,685,918	36,189	46,077	23,918	129,101	193,184
Variety stores	. 8,691	522,889	9,870	9,724	2,831	32,004	- 4,825			3,354		1,374	18,897	26,459
Other general merchandise stores	. 26,664	4,213,637	46,061	60,525	29,899	173,710	101,294	17,314	3,312,975	32,835	41,386	22,544	110,204	166,725
Food stores	164,995	27,593,375	354,908	381,421	228,817	1,594,971	820,036	112,300	22.455.415	238,363	294,943	143,934	1,221,907	1.165.145
Grocery stores	. 102,990		238,300	301,214	172,165		580,791	70,995		169,399	241,236	112,374	890,318	816,930
Meat and fish markets, including freezer provisioners		2,312,686	31,092	20,810	17,990	150,745	113,750			26,708		14,754	140,897	128,623
Fruit stores and vegetable markets		661,932	7,489	5,421	3,977	25,895	5,528	4,064	436,763	5,243		1,183	20,444	21,589
Candy, nut, and confectionery stores		231,006 842,493	6,256 25,503	5,277 17,131	801 10,293	14,472 73,476			121,807 496,300	3,052 11,031	2,026 9,922	*122 5,827	*3,874 49,328	12,841 40,161
Retail bakeries		876,965	31,736	20,206	18,888		56,120			12.553		6.751	83,321	85.684
Miscellaneous food stores		718,601	14,533	11,362	4,704	43,336	34,708		613,013	10,378		2.923	33,725	59,316
Automotive dealers and service stations		53,298,532	402,329	683,327	322,094	2,315,461	1,433,286	-	45,589,343	307.451		201,184	1.999,151	1,824,940
Motor vehicle dealers - new car dealers (franchised)		2,582,906	13,729	23,998	52,120	96,931	2,532	3,981	1,617,782			21,579	48,689	41,250
Motor vehicle dealers - used cars only		5,145,579	45,534	44,991	59,772	165,967	119,713	22,259				33,977	121,152	224,208
Auto and home supply stores	27,229	3,502,376	54,867	60,229	47,723	299,759	198,077	17,236				33,585	264,474	
Gasoline service stations		40,213,571	248,678	526,299	106,666	1,630,971	1,092,856			208,868		83,931	1,471,976	1,228,865
Boat dealers	. 7,009	586,813	18,391	7,835	21,051	41,810		2,313	275,887	3,254		5,612	25,853	18,115
Recreational vehicles		339,137	7,941	7,975	13,245		1,578		218,357	5,285		9,581	22,876	
Motorcycle dealers		807,041	11,041	11,327	19,641	51,372	28,670	2,525	625,908	9,235		11,869	41,688	
Miscellaneous aircraft and automotive dealers		121,108 5,114,523	2,147 84,019	673 113,132	1,876 84,310	*2,447 462,733	8,080 256,790	1,616 38.857	92,436 4,155,130	°1,320 54,974		*1,051 48,064	*2,443 373,200	
Men's and boys' clothing and furnishings stores	6,316	468,610	8,072	8,940	8,061	33,023	26,414	4,072		5,127		4,170	28,703	
Women's ready-to-wear stores		1,396,959	29,355	33,177	24,176					16,228		10,505	105,380	104,539
Women's accessary and specialty stores	2,383	127,505	1,221	1,666	219	12,941	6,816	1,154	95,960	*867		124	10,126	
Children's and infant wear stores	4,587	454,953	4,829	5,967	5,298	47,329	7,164	2,131	416,676	4,270	5,036	4,796	44,151	19,597
Family clothing stores	10,291	839,702	12,374	18,922	15,369	66,471	47,575	4,959	701,900		15,320	12,798	51,842	79,214
Shoe stores	. 8,262	1,094,935	12,272	24,842	17,693				853,678	7,551	18,293	9,060	84,036	
Furriers and fur shops		141,396	*684	*2,762	*608				*140,839	.683		*606	*16,233	
Apparel and accessory stores, not elsewhere classified	15,188	590,463	15,212	16,856	12,886	44,321	32,712	9,539	475,161	10,703	11,989	6,005	32,728	62,789

Footnotes at end of table.

Table 2. — Sole Proprietorship Businesses: Business Receipts, Selected Deductions, and Net Income, by Industry — Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Footnotes at end of table.

			Businesses w	vith and withou	t net income					Busine	sses with n	et income		
Industry	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income (less deficit)	Number of businesses	Business receipts	Depreciation	Taxes pa deduction		Payroll	Net income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	((11)	(12)	(13)	(14)
Wholesale and retail trade — Continued Retail trade — Continued							1 .							
Furniture and home furnishings stores	112,928	7,725,396	149,020	153,165	124,318	661,067	402,676	72,434	6,418,782	103,038	116,7	19 100,789	517,439	655,261
Furniture stores	30,307	2,436,831	47,699	42,905	37,307	135,197			2,082,646	38,793			102,224	
Floor covering stores	10,095	1,104,147	21,081	20,360	14,431	122,663			953,993	15,733				
Drapery, curtain and upholstery stores Home furnishings and equipment stores, except appliances	10,341 21,151	439,952 835,956	5,672 17,475	8,082 19,969	1,952 22,826				389,027 649,874	4,055 14,133			49,079 74,602	
Household appliance stores	15,213	1,398,288	11,669	25,822	25,140		,		1,165,704	9,309			88.771	91,778
Radio and television stores.	16,610	1,026,406	18,416	21,076	11,029				857,559	13,165				74,586
Music stores	9,211	483,816	27,007	14,951	11,632	50,012	- 5,354	3,989	319,979	7,849	6,6	6,550	16,308	36,511
Eating and drinking places	228,350	17,852,266	545,555	697,901	320,503				13,109,518	345,434			1,990,663	
Eating places		13,365,366		505,557	236,169				9,881,638					
Drinking places	66,611 1,154,720	4,486,901 29,961,571	122,642 584,795	192,344 507,911	84,334 330,971	507,781 1,618,751	197,985		3,227,881 24,448,158	74,175 370,188			324,189 1,303,706	
Drug stores and proprietory stores	14.460	2,825,457	29,254	44.469			282,121		2,716,942				278,199	
Liquor stores	25,065	5,038,021	54,169	113,292					4,299,776			78 31,271	202,731	
Used merchandise stores	82,122	2,095,060	51,766	31,891	37,467	69,913			1,592,384				61,747	
Sporting goods and bicycle shops	42,543	2,161,482	40,083	39,095					1,792,721	25,078				
Book stores	14,897	477,428	6,685	5,807 12,706	3,174 4,351		42,917		408,104 410,828	3,659 8,207			15,226 50,714	
Stationery stores	5,791 29,706	435,519 1.541.899	8,717 22.039	35,431	25,069	52,159 112,744	179.387		1,286,411	17,179			82,201	
Hobby, toy, and game shops	16,289	338.375	8.319	5,104	6,424				233,247	3,866		84 4,737	5,867	21,698
Camera and photographic supply stores	1,258	92,624	3,038	2,659					83,444	2,714		1,166	*3,914	
Gift, novelty, and souvenir shops	32,456	994,998		20,236										1
Luggage and leather goods stores		50,742	1,623	*1,067	*970	*268			45,590			137	•76	
Sewing, needlework, and piece goods stores	16,024 20,585	321,488 385.069		6,029 6,155			22,305 50,447		225,057 319,917	3,188 4,916		532 1,288 321 3,115		
Mail order houses	15,182	753,444	55,394	17.598		37,839			666,811	42.695			34,295	
Direct selling organizations	698,659	4,835,907	110,762	36,727	37,887	79,496	- 46,379		3,311,416	55,154	23,	18,951	46,466	579,388
Fuel and ice dealers, except fuel oil dealers and bottled gas				l			l				1 1 .			J
dealers	12,478	406,793			1				386,742		1 1 '	3,468		
Fuel oil dealers	5,416	1,299,366		11,350	6,260				1,078,046 124,435			707 4,069		
Liquified petroleum gas (bottled) dealers	1,089 33,024	136,725 1,169,607		2,367 33,346	1,345 16,128		4,841 32,283		875.296			007 1,085 284 7,299	91,712	
Cigar stores and stands	4,359	268,515		7,259	*2,109				248,080			73 1,344	*11,725	
News dealers and newstands	7,936	627,083	12,180	9,484	3,629	53,644	40,462	5,653	522,390	6,312	4.	122 12,620	*26,022	47,459
Other miscellaneous retail stores	72,396	3,705,969	1 '	59,850	45,967	138,71								
Retail trade not allocable	34,832	1,285,575		18,399	11,662									
Wholesale and retail trade not allocable	131,063	5,815,323	1	68,220	63,019	1	560,180	1 .		1	1 1	1		1
Finance, insurance, and real estate	1,048,966	21,530,768												
Finance	37,820	2,861,286		14,684	144.447									
Banking and miscellaneous finance	1,060 3,647	94,350 103,671		651 1,059	38,168 15,884		15,429 22,194		63,909 84,407			579 10,776 554 8,255		
Security and commodity brokers and services	33,113	2,663,265		12,973								216 19.417		
Security brokers and dealers, except underwriting syndicates	19,264	1,592,359		8,439	49,872				650,852	6,346	6.	11,875		274,965
Commodity contracts brokers, exchanges, and services	13,849	1,070,906	12,546	4,535	40,523	17,626	145,483	10,512	648,433	7,568	2,	7,542	11,481	211,506
Insurance agents, brokers, and service	238,817	6,507,098	1 .	65,016	100,260		1			127,303				1
Real estate	772,329	12,162,384		259,800										
Operators and lessors of buildings	27,734	1,074,088	178,020 73,689	77,407 40,563	276,431 97,218	72,824	- 4,281 - 27,545		613,674 204,036					
Lessors, other than buildings	. 56,057 662,499	344,091 9,813,793		122,041	437,978						70.			
Title abstract companies	3,499	60,445		628	1,349				60,445			528 *1,349		
Subdividers and developers, except cemeteries	8,199	530,435		12,473	78,013	1			348,738			97 20,539	2,920	89,278
Cemetery subdividers and developers	*1,616	*8,535	*558	*392	*2,388	319	*- 288	1,218	*3,008	1 *23		·22 ·6·	· -	*1,043
Combined real estate; insurance, loans, law offices	12,725	330,998	8,131	6,298	13,954	18,073	135,705	9,246	318,644	l 6,78€	5,	954 11,219	15,309	143,851

Table 2. — Sole Proprietorship Businesses: Business Receipts, Selected Deductions, and Net Income, by Industry — Continued

[All figures are estimates based on samples-money amounts are in thousands of dollars]

	Businesses with and without net income				Businesses with net income									
Industry	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroll	Net income (less deficit)	Number of businesses	Business receipts	Depreciation	Taxes paid deduction	Interest	Payroli	Net income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Services	3,842,790	87,964,739	4,311,519	1,680,322	1,804,265	11,044,936	26,433,341	2,910,151	79,181,840	2,789,318	1,391,640	1,152,927	9,592,646	29,973,211
Hotels and other lodging places	58,819	2,774,216	333,399	154,256	282,676	340,645	131,433	31,216	2,047,881	179,896		144,344	255,159	311,438
Hotels Motels, motor hotels, and tourist courts	3,942 31,777	399,968 1,907,682	27,704 239,522	16,420 112,913	19,446 219,651	78,626 235,498	15,107 126,202	3,281 16,169	309,236 1,413,610	17,219 136,139	12,145 80.654	9,847 114,447	52,693 185,617	36,195 223,386
Rooming and boarding houses	7,678	126,647	10,666	7,950	11,325	8,984	17,404	5,856	108,923	8,500	5,933	9,513	*7,602	
Sporting and recreational camps	1,749	156,233	11,573	2,375	8,595	10,754	4,841	1,331	138,536	8,251	1,690	*6,751	*5,917	11,744
Trailering parks and camp sites	13,644	183,356	43,916	14,590	23,654	6,755	- 32,119	4,553	77,360	9,787	3,162	3,785	3,330	17,760
Organizational hotels and lodging houses, on a membership basis	•29	*329	*18	•9	*5	*29	*- 2	*26	*217	l _	_	_	_	*35
Personal services	736,700	10,000,298	498,059	241,112	177,286	1,664,759	2,565,814	599,599	8,906,230	337,073	202,617	118,832	1,439,843	2,897,851
Coin-operated laundries and dry cleaning	20,183	576,648	76,465	11,686	26,718	49,199	35,712	10,733	428,975	40,270		12,239	36,447	74,869
Other laundry, cleaning, and garment services		1,792,584	113,303	53,854	38,559	363,450	296.554	36,584	1,587,324	82,312		24,756	310,909	346,097
Photographic studios, portrait	61,759 252,688	754,327 3,590,985	55,274 114,715	15,086 96,368	13,925 38,497	62,130 868,154	98,219 975,969	30,010 212,363	638,545 3,234,289	32,521 83,803	13,372 81,472	10,712 24,381	57,740 754,273	178,530 1,046,246
Barber shops	78,793	946,613	20,697	17,301	7,465	101,623	493,662	74,457	925,258	19,877	16,036	7,360	94,704	498,192
Shoe repair and hat cleaning shops	11,423	317,805	8,970	5,811	3,915	30,153	84,318	9,337	279,914	6,107	4,742	2,550	24 996	
Funeral service and crematories	9,897 254,099	841,428 1,179,908	43,514 65,122	22,365 18,641	21,609 26,599	88,193 101.858	177,929 403,451	7,392 216,723	782,642 1,029,283	39,384 32,799		19.735 17,099	82,174 78,699	
Business services.	865,817	14,520,287	879,318	197,423	321,711	1,290,870	4,281,942	658,008	12,702,941	461,864	147,250	150,980	1.044.787	5.111.976
Advertising	29,977	1,284,214	32,973	8,721	12,229	86,555	169,520	20,866	1,065,611	18,177	5,377	8,410	61.185	207,748
Services to buildings	142,752	1,560,106	67,328	32,095	16,016	307,782	478,470	122,864	1,460,953	50,932		13,106	279,738	525,182
Computer and data processing services	30,927 280,940	522,011 4,543,875	39,204 155,599	5,403 34,553	10,573 71,798	36,763 162,238	190,885 2,041,179	24,059	494,126 4,224,454	19,788		5,069	36,083	217,701
Management and public relations	35,356	1,109,371	372,065	28,762	140.219	77,233	- 43.606	214,315 14,308	770,540			46,538 44,277	121,991 59,231	2,322,343 160,453
Other business services	345,865	5,500,709	212,148	87,889	70,875	620,298	1,445,495	261,596	4,687,257	131,848		33,580	486,559	1,678,548
Automobile repair and services	224,712	9,425,292	424,428	228,322	183,372	1,418,195	1,018,493	162,441	8,180,176		190,923	130,588	1,152,254	1,261,633
Automotive rentals, without drivers	11,759	404,989	118,434	8,329	34,889	9,828	12,019	4,619	287,027	67,898	4,785	20,639	5,629	46,169
Automobile parking	2,962 49,712	102,927 2,363,949	846 75,822	3,488 53,696	1,162 39,179	22,429 390,052	18,502 308,310	2,277 39,205	95,205 2,161,348		3,048 49,598	*762 30,170	18,079 356,216	21,963 349,348
General automotive repair shops	113,348	4,432,647	143,206	104,868	67,807	663,337	436,799	82,129	3,712,671	102,345		48,237	472,406	
Other automotive repair shops	21,163	1,279,546	37,085	36,511	13,771	237,977	146,324	16,952	1,184,471	32,876		11,629	221,888	
Automotive services, except repair	25,768	841,234	49,034	21,429	26,563	94,573	96,540	17,259	739,453	,		19,150	78,036	
Miscellaneous repair services	266,929 27,111	6,124,526 632,468	237,569 23,754	112,923 13,544	91,511 7,865	643,330 47,880	1,256,404 113,804	196,995 21,599	5,526,257 585,971	180,964 20,892		76,578 7,586	563,958 40,114	
Electrical repair shops, except radio and TV	39,413	1,265,360	32,395	26,294	17,471	137,132	254,056		1,133,667	27,424		15,932	113,312	
Reupholstery and furniture repair	38,715	917,941	31,283	20,943	14,771	155,302		32,389	874,975	25,655		13,549	150,061	192,069
Other miscellaneous repair shops	161,690	3,308,757	150,137	52,142 7,565	51,404	303,015			2,931,644	106,993		39,511	260,471	808,732
Motion pictures	15,478 13,546	315,839 242,905	33,547 29,793	7,565 3,954	9,047 4,033	29,209 20,574	36,611 30,221	9,566 8,424	273 971 214,510	13,350 10,376		5,192 1,160	27,243 19,558	
Motion picture theaters	1,932	72,934	3,754	3,611	5,014	8,635	6,391	1,142	*59,462	*2,974	*2,898	*4,033	*7,686	
Amusement and recreation services, except motion pictures	313,006	4,034,985	447,168	76,030	110,378	348,486		156,882	2,897,303	151,483		36,628	220,975	
Producers, orchestras, and entertainers	149,964	1,492,465	107,881	9,527	17,547	90,769	327,117		1,215,930	50,256	7,122	12,022	72,626	
Billiard and poof establishments	2,886 1,536	69,331 110,326	3,127 7,349	1,683 4,287	*312 5,702	*1,671 12,591	22,958 10,138		67,887 90,675	2,938 4,324		*312 *3,167	*1,640 *7,767	
Professional sports clubs and promoters	1,437	102,125	5,468	3,938	*3,314	18,202	- 2,869		84,803	2,716	*3,093	*1,732	*10,333	
Racing, including track operation	63,502	727,085	162,945	11,674	25,401	48,396	- 433,875	10,214	289,781	22,908	3,770	2,198	10,464	
Other amusement and recreation services	93,681	1,533,653	160,397	44,921	58,101	176,857	58,350	47,064	1,148,226	68,341		17,197	118,145	
Medical and health services	416,177 150,877	23,240,527 9,949,187	758,750 285,100	403,939 144,414	365,059 96,521	3,313,997 1,144,718	10,360,312 5,337,208	370,237 135,234	22,428,427 9,717,453	697,460 264,810		317,345 83,864	3,114,255 1,112,756	
Offices of dentists	82,265	7,055,754	250,772	135,436	139,105	1,144,601	2.947.322		6,995,636			130,683	1,1133,688	
Offices of osteopathic physicians	2,421	283,772	7,611	5,155	*810	115,734	86,694	2,311	283,536		5,121	*810	115,734	86,695
Offices of chiropractors	19,210 18,863	977,123 1,653,857	50,058 49,600	16,234 30,475	31,835 28,024	91,446 200,829	398,671 475,663	17,450	942,846 1,448,293	48,491 44,152		31,534	87,138	
Offices of optometrists		310.841	4,319	1,362	927	*2.041	236.840	16,629 43,107	305.079	1		26,875 *362	136,978	239.448
Nursing and personal care facilities	12,915	882,331	39,613	40,363	43,995	305,932	64,932		691,080			27,231	234,831	
Hospitals	•29	*46,916	*887	1,923	*729	*19,741	1,087	1 128	*29,566	*309	*1,153	1268	12,243	1,358
Medical laboratories	1,691	60,762 545,186	3,921	1,350 10,889	*548 4,824	14,803	12,818		54,029	1,502	1,339		14,742	
Dental laboratories	11,169 71,713	1,474,798	16,655 50,215	16,338	17,740	96,800 177,352	157,887 641,190	10,157 58,666	533,322 1,427,587	16,468 44,052	10,679 15,367	10,717	94,649 171,489	
Legal services	175,718	6,605,098	190,743	96,005	62,266	736,833	3,183,895	147,081	6,373,420	160,114	88,816	50,946	691,626	3,282,156
Educational services	176,148	1,260,138	72,999	28,800	29,012	143,497	317,585	136,605	1,078,631	48,545			102,101	
Engineering and architectural services	93,339 180,404	2,849,987 2,596,726	139,026 97,495	44,969 40,413	30,350 48,194	430,677 391,933	977,324 1,209,733	76,072 156,635	2,737,952 2,488,377	71,340 77,366		24,588 33,288	399,462 368,159	
Certified public accountants	33,639	1,129,560	36,855	20,071	24,779	207,964	513,819	29,276	1,097,624	34,270		17,568	196,996	
Other accounting, auditing, and bookkeeping services	146,765	1,467,166	60,640	20,342	23,415	183,969	695,914	127,359	1,390,753	43,096	18,409	15,720	171,162	734,557
Other services	319,543	4,216,820	199,018	48,565	93,404	292,506			3,540,274	113,563			212,825	1
Nature of business not allocable	75,376	1,779,126	82,571	29,147	31,515	70,647	322,414	58,464	1,527,492	51,385	18,658	13,861	56,109	454,994

^{*}This estimate should be used with caution because of the small number of sample returns on which it was based.

*The estimate for this cell is not shown to avoid disclosure of information for specific taxpayers. However, the data are included in the appropriate totals.

NOTE: Detail may not add to total because of rounding.

DATA SOURCES AND LIMITATIONS

-- Coefficient - - Number of --

The partnership statistics are based on a sample of partnership returns, Forms 1065, processed by the Internal Revenue Service during 1981. The sample was stratified based on industry, gross receipts, net income or deficit, and total assets, and selected at rates that ranged from 0.18 percent to 100 percent. There were 45,770 returns in the sample drawn from a population of 1,467,132.

The sole proprietorship statistics are based on a sample of individual income tax returns, Forms 1040, processed during 1981. The sample was stratified based on the presence or absence of Schedule C, Profit (or Loss) from Business or Profession; State in which filed; adjusted gross income or deficit or largest selected source of income or loss; and size of business plus farm receipts. The returns were selected at rates that ranged from 0.05 percent to 100 percent. There were 82,021 returns (accounting for 95,809 businesses) in the sample, estimating a total population of 11,406,161 returns (and 12,701,597 businesses).

Because the statistics are estimates based on samples, they are subject to sampling error. The upper limits for the coefficient of variation shown below (for frequency estimates only) are intended as a general indication of the reliability of the data.

<u>Figure E. -- Coefficient of Variation of Estimated</u>
Number of Businesses

Number of

Partnerships-	sSole-Proprietorship						
	Farming	All other industries					
1,370,000	6,179,300	1,611,300					
220,000	988,700	257,800					
55,000	247,200	64,500					
14,000	61 800	16,100					
6,100	27,500	7,200					
2,200	9,900	2,600					
	1,370,000 220,000 55,000 14,000 6,100	Faming 1,370,000 6,179,300 220,000 988,700 55,000 247,200 14,000 61,800 6,100 27,500					

Additional information about the Statistics of Income samples and on sampling as well as on nonsampling error may be found at the end of this report.

NOTES AND REFERENCES

- [1] Statistics of Income--1979-1980, Sole Proprietorship Returns. For more detailed statistics on partnerships for 1979, see Statistics of Income --1979, Partnership Returns.
- [2] See Wilson, Robert A., "Unincorporated Business Activity for 1979," <u>SOI Bulletin</u>, Vol. 1, No. 3, page 41.
- [3] Partnerships that were in business at any time during the year were required to file a return of income. Thus, the number of returns for 1980 include final returns of businesses that had liquidated during the year. Therefore, the increase in the total number of partnership returns for recession year 1980 may have included a disproportionate increase in the number indicating that the business had been liquidated by the close of its accounting period. The number of "final returns" for 1980 have not been tabulated.
- [4] A limited partnership is one formed by two or more persons having as members one or more general partners and one or more limited partners. A limited partner, by agreement, is not responsible for partnership indebtedness-except to the extent of the partner's own investment contribution to the business.
- [5] For additional information about partnerships as tax shelters, see, for example, Tannenhauser, Robert and Carol, <u>Tax Shelters A Complete Guide</u>, Crown Publishers, Inc., 1978; and Biel, <u>Dennis H.</u>, and Stevenson, W.C., "Tax Shelters: A Primer for CPAs," <u>Journal of Accountancy</u>, June 1982

Nonresident Alien Income and Tax Withheld, 1980

By Chris R. Carson*

Income paid to foreign individuals and organizations exceeded \$6.5 billion during 1980. This was a 31 percent increase from 1979 for this U.S. source income. The major reason for this increase was that interest payments rose a dramatic 64 percent, to over \$2.6 billion. The U.S. tax withheld on all income exceeded \$685 million.

A U.S. individual or organization that pays income to nonresident aliens [1] reports this income and the tax withheld on the Form 1042S. While the basic tax rate is 30 percent, certain types of income are taxed at different rates. Income paid to countries that have entered into tax treaties with the United States is usually taxed at lower rates. Income that is connected with the recipient's trade or business is exempt from withholding.

Dividends and interest are the most common kinds of income paid, making up 88 percent of the total for 1980. Most income, about 79 percent, was paid to corporations and individuals. Eight countries—Switzerland, the United Kingdom, Canada, the Netherlands, the Netherlands Antilles, West Germany, Japan, and France—received about 84 percent of all income, with the first four receiving over half.

DATA ANALYSIS AND TRENDS

Income paid rose considerably faster (31 percent) than tax withheld (11 percent) from 1979 to 1980. This was mainly due to the large increase in income that was exempt from tax withholding (58 percent more than in 1979). Most of this increase is probably due to the rise in interest payments to tax treaty countries. Interest income is exempt from withholding under treaties negotiated with several major income-receiving countries. Tax treaty countries received 39 percent more income in 1980 than in 1979. Income subject to withholding increased by a modest 21 percent.

The average income paid reported on Forms 1042S increased from \$8,561 to \$10,803 from 1979 to 1980. The average Form 1042S income for individuals was about \$1,600, while Forms 1042S reporting payments to corporations averaged over \$50,000 of income. This figure for corporations is 52 percent more than the corresponding amount for 1979 (\$33,000).

Income Type

As noted earlier, interest income rose 64 percent to over \$2.6 billion. Rising interest rates in the United States during recent years were responsible for most, if not all, of this increase. Dividends rose to over \$3.1 billion in 1980 after falling slightly in 1979. In 1979, dividends represented 54 percent of all income compared to 32 percent for interest. This 22 percent disparity fell to 8 percent in 1980 as shown in Figure A. Other common types of income were rents, royalties, capital gains, and pensions.

Gross Income Paid (thousands)

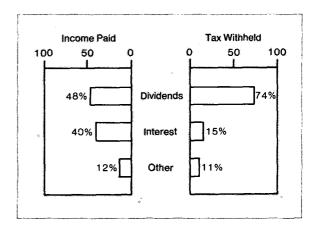
Income Type	<u>1978</u>	1979	1980
Dividends . Interest Other	. 990,949	\$2,707,108 1,591,309 717,728	\$3,147,752 2,604,307 824,316
Total	. 4,450,807	5,016,145	6,576,375

About 74 percent of the total tax was withheld from dividends, as they are taxed at a higher rate than most other income types in several major treaty countries. Although interest made up 40 percent of all income, tax withheld on interest payments represented only 15 percent of all tax.

Figure A.

Percent of Total Income Paid and

Percent of Total Income Paid and Percent of Total Tax Withheld, by Income Type, 1980



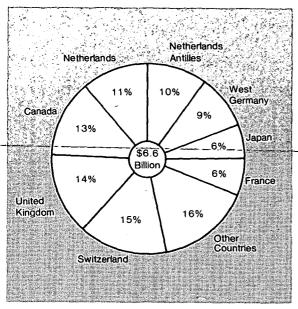
Country of Recipient

The eight countries shown in Figure B received 84 percent of all income paid. These countries were responsible for virtually all of the income increase in 1980. Income paid to the Netherlands Antilles increased by 84 percent while West Germany received 63 percent more income than in 1979. Increases of over 40 percent were recorded by the Netherlands, Switzerland, and the United Kingdom. Increases to Canada, France, and Japan were more modest. Other countries averaged only a 4 percent increase.

^{*}Foreign Returns Analysis Section. Prepared under the direction of Jeffrey A. Hartzok, Acting Chief.

Figure B

Percent of Total Income Paid, by Country of Recipient, 1980



-Tax-Treaty-Countries-

From 1979 to 1980 there was a definite shift of Form 1042S income to tax treaty countries. Income paid to treaty countries rose 39 percent from 1979 to 1980. During the same period income paid to nontreaty countries actually decreased by 11 percent. Total treaty country income (\$5.9 billion) represented 90 percent of all income (\$6.6 billion) in 1980. The corresponding figure for 1979 was 85 percent. This does not appear to be a trend, however, as treaty country income represented 90 percent of all income in 1977 and 89 percent in 1978.

Gross Income Paid (thousands)

Country Status	1979	1980	Change
Treaty Nontreaty		\$5,909,728 666,647	39% -11
Total	. 5,016,145	6,576,375	31

"Tax Haven" Countries

Income paid to certain countries that are sometimes described as tax havens is relatively substantial. In 1980, Switzerland and the Netherlands Antilles received over \$998 million and \$632 million, respectively. Form 1042S income seems more substantial when compared to the Gross National Product (GNP) of certain tax haven countries. U.S. source income was greater than 57 percent of the GNP figure for the Netherlands Antilles (see Table 2). The ratio for the British Virgin Islands was over 32 percent in 1978, the latest year for which GNP data are available for that country. U.S. source income represents a substantially larger share of GNP for tax haven countries than for other foreign countries, as shown in Table 2. This incometo-GNP ratio is far greater for the Netherlands Antilles (760 times) and the British Virgin Islands (427 times) than the average ratio for all countries. Although Switzerland received more income than any other country (\$998 million), this income was less

than one percent of its Gross National Product. GNP information was not available for several other tax haven countries.

The United States recently decided to terminate its tax treaty with the British Virgin Islands, at least partially because of its tax haven status. The termination is effective Jan. 1, 1983. In 1980, the British Virgin Islands received Form 1042S income of about \$56 million. More than \$2 million of tax was withheld from this income.

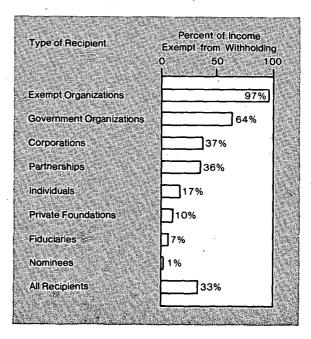
Type of Recipient

The vast majority (70 percent) of Forms 1042S filed reported payments to individuals. However, individuals received only about 10 percent of the total income paid. By contrast, 69 percent of all income reported on Forms 1042S was paid to foreign corporations. Foreign partnerships, fiduciaries, nominees, government organizations, exempt organizations, and private foundations also commonly receive income reported on Forms 1042S. Private foundations differ from exempt organizations as the rules dealing with expenditures and money transactions are more strict for private foundations. A nominee differs from a fiduciary in that a nominee has little or no freedom to exercise judgment or control over income received.

Income that is connected with the recipient's U.S. trade or business is exempt from withholding and is taxed as though it were received by a U.S. individual or organization. Certain kinds of income (some dividends, certain interest, etc.) are also exempt from withholding under tax treaties negotiated by the United States. Income-paid-to-foreign-exempt_organizations is generally not taxed, as these organizations are treated as though they were U.S. exempt organizations. Figure C shows the percent of income exempt from withholding for each type of recipient. The percentage is greater for corporations (37 percent) than for individuals (17 percent), which helps explain why corporations received 69 percent of the total income, but had only 62 percent of the total tax withheld from their income. By contrast individuals received about 10 percent of all income, but were responsible for 16 percent of the total tax withheld.

Figure C

Percent of Income Exempt from Withholding, by Recipient Type, 1980



OTHER INFORMATION

Payors of income to nonresident aliens must withhold tax in accordance with Chapter 3 of the Internal Revenue Code. The Form 1042S is filed to report this income and the U.S. tax withheld. Often the payor has a financial institution act as withholding agent.

Recipients in tax treaty countries typically enjoy lower U.S. tax rates. However, if the income is paid to a foreign nominee or fiduciary, additional withholding is often required and is held by the government in the country of the nominee or fiduciary. The purpose of this additional withholding is to prevent citizens of nontreaty countries from taking advantage of the lower tax rates of treaty countries. The foreign government holds this additional tax until the ultimate recipient proves residency in that country. If residency is not proven within a period of time specified by the treaty, the tax is remitted to the United States (see Table 1, column 7). In the case of Canada, nominees and fiduciaries act as withholding agents and remit this additional tax directly to the Internal Revenue Service (IRS).

The present statistics are tabulated by calendar year, based on all Forms 1042S processed at the Philadelphia Service Center. The years indicated in the tables represent the year in which the income was paid and the U.S. tax withheld, except for the tax from foreign governments and withholding agents. These amounts are shown by the year the tax was remitted to the United States under treaty agreements. Tax withheld amounts and percentages shown in Figure A and Table 3 do not include tax withheld by foreign governments and withholding agents (except Canada). This additional withholding cannot be

properly attributed to specific recipient and income types. Definitions and other information are available in the Spring 1982 SOI Bulletin and IRS Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Corporations.

As all Forms 1042S are included in these statistics, they are not subject to sampling error. The data are subject to nonsampling errors such as computer data entry errors and taxpayer reporting errors. Forms 1042S with income greater than \$500,000 were manually verified. A limited computerized correction program was used to test the data for basic numerical relationships.

REFERENCES

- [1] For purposes of this article a nonresident alien is defined as an individual whose residence is not within the United States and who is not a U.S. citizen. Also, corporations and other organizations created or organized outside the United States are considered nonresident aliens.
- [2] See also Carson, Chris, "Nonresident Alien Income and Tax Withheld, 1971-1979," <u>SOI Bulletin</u>, Vol. 1, No. 4, pp. 34-38.
- [3] World Bank, 1981 World Bank Atlas, p. 12-22.
- [4] Department of the Treasury, Internal Revenue Service, Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Corporations (Revised November 1981).

Table 1.--Number of Forms 1042S Filed, Gross Income Paid, Tax Withheld, and Other Items, by Selected Treaty and Nontreaty Countries, 1980

[Money amounts are in thousands of dollars]

			Income paid			Tax withhel	d
Country or Geographic area	Number of Forms 1042S filed	Total	Exempt from withholding	Subject to withholding	Total	Domestic withholding agents	Foreign Governments and withholding agents
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total	608,781	6,576,375	2,173,816	4,402,559	686,208	615,021	71,187
Treaty country, total	498,670	5-909-728-	1 , 976 , 996-	3 , 932,-732-	-589,422-	518,235_	71,187_
Australia. Austria. Belgium. Canada. France. Germany, Federal Republic.	7,719 3,871 14,158 265,411 14,069 46,878	17,467 10,500 136,871 838,907 410,064 619,222	2,673 2,957 37,191 201,229 47,382	14,794 7,543 99,680 637,678 362,682 161,283	2,996 1,230 18,220 92,473 39,959 22,754	2,996 1,230 15,031 92,473 39,208	3,189 - 751
ItalyJapanLuxembourgNetherlands	7,070 5,280 6,080 14,945	48,480 413,344 32,973 699,980	10,912 115,030 8,941 148,324	37,568 298,314 24,032 551,656	7,938 39,763 5,925 74,018	7,938 39,763 4,756 73,478	- 1,169 540
Netherlands Antilles Sweden Switzerland United Kingdom Other treaty countries	1,712 4,599 22,209 65,393	632,163 31,798 998,478 904,316 115,165	524,230 7,100 113,816 235,345 63,927	107,933 24,698 884,662 668,971 ———51,238	9,339 3,058 179,034 84,165 8,550	9,337 3,058 115,034 82,751 8,428	2 - 64,000 1,414 122
Nontreaty country, total	110,111	666,647	196,820	469,827	96,786	96,786	
Bahamas	1,994 1,974 585 9,948 802 7,652	22,179 54,166 17,303 31,935 19,404 25,407	855 5,105 9,187 1,262 714 3,045	21,324 49,061 8,116 30,673 18,690 22,362	5,965 14,261 2,348 9,016 3,432 6,307	5,965 14,261 2,348 9,016 3,432 6,307	- - - -
Panama Portugal Saudi Arabia Spain United Arab Emirates Other nontreaty countries	2,467 873 1,267 4,592 390 77,567	39,201 10,980 101,488 13,520 25,472 305,592	8,141 196 99,531 2,284 23,572 42,928	31,060 10,784 1,957 11,236 1,900 262,664	8,870 636 528 2,930 562 41,931	8,870 636 528 2,930 562 41,931	- - - -

Table 2.--Gross National Product (GNP), Gross Income, Interest and Dividends, and Gross Income and Interest and Dividends as a Percent of GNP, by Selected Country of Recipient, 1980

[Money amounts are in thousands of dollars]

		Gross i	ncome	Interest and dividends			
Country or Geographic area	Gross National Product ¹	Total	As a percent of GNP	Total	As a percent of GNP		
	(1)	(2)	(3)	(4)	(5)		
Netherlands Antilles. British Virgin Islands ² . Bermuda. Antigua. Bahamas.	1,100,000 25,410 660,000 100,000 800,000	632,163 8,195 54,166 3,548 22,179	57.47 32.25 8.21 3.55 2.77	603,763 7,139 44,893 3,466 21,350	54.89 28.10 6.80 3.47 2.67		
Panama. Switzerland. Luxembourg. Netherlands. All countries.	3,170,000 106,300,000 5,200,000 161,440,000 8,698,581,000	39,201 998,478 32,973 699,980 6,576,375	1.24 0.94 0.63 0.43 0.08	34,585 922,776 31,978 675,028 5,752,059	1.09 0.87 0.61 0.42 0.07		

¹ World Bank, 1981 World Bank Atlas, pp. 12-22. Total GNP figure for "All countries" does not include United States GNP; it also does not include GNP of several smaller countries whose GNP data were not available. GNP figure for British Virgin Islands is for 1978.

²Data for British Virgin Islands are for 1978 as GNP figures for later years were not available.

Table 3.--Number of Forms 10428 Filed, Gross Income, and Tax Withheld by Income Type, by Recipient Type and Country of Recipient, 1980
[Money amounts are in thousands of dollars]

	Number -5	Cruss		Tax wit	hheld	
Country or Geographic area	Number of Forms 1042S filed	Gross income paid	Total	Interest	Dividends	Other
ALL RECIPIENTS	(1)	(2)	(3)	(4)	(5)	(6)
Total	608,781	6,576,375	615,021	95,917	453,298	65,806
Australia. Bahamas. Belgium. Belgium. Bermuda. British Virgin Islands.	7,719	17,467	2,996	472	1,032	1,492
	1,994	22,179	5,965	811	4,934	220
	14,158	136,871	15,031	5,140	8,087	1,804
	1,974	54,166	14,261	6,331	5,636	2,294
	405	56,461	2,260	99	2,041	120
Canada Cayman Islands. France. Germany, Federal Republic. Hong Kong.	265,411	838,907	92,473	27,334	53,486	11,653
	585	17,303	2,348	897	1,358	93
	14,069	410,064	39,208	7,396	27,947	3,865
	46,878	619,222	22,754	408	18,133	4,213
	9,948	31,935	9,016	1,289	6,711	1,016
Italy. Japan. Liechtenstein. Luxembourg. Mexico.	7,070	48,480	7,938	759	1,871	5,308
	5,280	413,344	39,763	12,573	19,391	7,799
	802	19,404	3,432	390	2,864	178
	6,080	32,973	4,756	244	4,275	237
	7,652	25,407	6,307	842	2,950	2,515
Netherlands.	14,945	699,980	73,478	1,628	71,009	841
Netherlands Antilles.	1,712	632,163	9,337	1,661	7,587	89
Panama	2,467	39,201	8,870	1,254	6,777	839
Saudí Arabia	1,267	101,488	528	43	371	114
Spain	4,592	13,520	2,930	792	1,551	587
Sweden. Switzerland. United Arab Emirates. United Kingdom. Other countries.	4,599	31,798	3,058	73	1,855	1,130
	22,209	998,478	115,034	16,709	93,251	5,074
	390	25,472	562	27	532	3
	65,393	904,316	82,751	1,426	73,757	7,568
	101,182	385,776	49,965	7,319	35,892	6,754
INDIVIDUALS Total	427,419	684,549	98,938	10,895	60,992	27,051
Australia. Bahamas. Belgium. Bermuda British Virgin Islands.	6,601 949 7,168 674 192	6,499 2,474 6,053 6,241 965	1,030 630 794 1,784 152	183 81 137 96 15	351 469 558 1,391	496 80 99 297
Canada Cayman Islands Prance. Germany, Federal Republic. Hong Kong	198,881 101 10,336 37,649 7,339	129,048 385 47,522 67,396 13,795	14,442 100 5,145 8,761 3,890	2,376 6 509 151 226	8,335 93 3,113 7,263 3,529	3,731 1,523 1,347 135
Italy. Japan. Liechtenstein. Luxembourg. Mexico.	5,612	29,849	6,498	497	710	5,291
	3,731	25,694	2,477	569	1,282	626
	303	5,128	1,290	41	1,152	97
	869	1,172	207	7	195	5
	6,562	14,508	3,528	527	2,117	884
Netherlands. Netherlands Antilles. Panama. Saudi Arabia. Spain.	3,991	13,550	1,747	15	1,291	441
	455	35,062	1,469	11	1,443	15
	1,308	6,946	1,847	52	1,696	99
	1,101	3,368	395	31	250	114
	3,953	7,514	1,843	551	762	530
Sweden. Switzerland. United Arab Emirates. United Kingdom. Other countries.	4,010	7,502	1,341	20	221	1,100
	9,573	50,878	7,236	552	5,673	1,011
	237	204	45	5	38	2
	37,054	69,998	8,585	312	4,326	3,947
	78,770	132,798	23,702	3,925	14,598	5,179
CORPORATIONS Total	89,953	4,523,657	379,485	69,752	275,165	34,568
Australia Bahamas. Belgium. Bermuda. Bermida. British Virgin Islands.	415 732 3,752 707 154	8,479 13,303 104,036 42,176 51,019	1,629 3,691 10,223 10,850 1,456	272 531 4,330 5,958 54	397 3,025 4,189 2,896 1,289	960 135 1,704 1,996
Canada Cayman Islands France. Germany, Federal Republic. Hong Kong	34,579	553,423	57,561	22,234	28,544	6,783
	407	15,522	1,861	825	945	91
	1,249	276,591	22,913	3,515	17,475	1,923
	2,916	283,380	8,749	62	5,829	2,858
	614	11,363	3,209	997	1,357	855
Italy Japan. Liechtenstein. Luxembourg. Mexico.	266	15,786	963	206	756	1
	1,200	377,899	36,374	11,795	17,501	7,078
	270	11,523	1,352	212	1,083	57
	4,040	24,724	3,508	229	3,059	220
	415	7,712	2,068	190	491	1,387
Netherlands Netherlands Antilles Panama Saudi Arabia. Spain.	8,588 1,024 805 22 151	564,724 575,158 24,613 35,816 4,861	58,265 6,328 5,227 14 815	1,494 1,611 1,070 8 228	56,426 4,668 3,421 5	345 49 736 1 38
Sweden. Switzerland. United Arab Emirates. United Kingdom. Other countries.	142	18,566	1,151	52	1,080	19
	5,153	700,533	75,958	11,111	61,126	3,721
	31	20,549	443	22	421	-
	14,593	649,101	48,390	632	45,149	2,609
	7,728	132,800	16,487	2,114	13,484	889

Individual Income Tax Returns: Selected Characteristics From the 1981 Taxpayer Usage Study

By Dorothea Riley*

The number of individual income tax returns filed through April of this year was 90.7 million, up 1.5 million from the comparable period last year. The overall increase in the total number of returns filed is due to many factors, including rising incomes and an increase in average employment of about 1 million in Tax Year 1981 [1]. More than half of the increase between 1980 and 1981 was accounted for by the increase in the number of Forms 1040A filed--from 36.3 million for a comparable period last year to 37.1 million this year. The increase is a reversal of the pattern observed between comparable periods for Tax Years 1979 and 1980 when the number of Forms 1040A filed decreased by 2.2 percent and Forms 1040 increased by 2.3 percent.

Number of Forms 1040 and 1040A Filed (Thousands of returns)

Form Type	1979	1980	1981
1040 1040A	. 51,651 . 37,118	52,840 36,314	53,544 37,126
Total	. 88,769	89,154	90,670

Generally, the relative proportion of Form 1040A returns filed to Form 1040's declines, or at least remains stable, between tax years in which there are no new tax laws implemented or in which there is no broadening of eligibility for Form 1040A usage. The increase of over 800,000 Forms 1040A from 1980 to 1981 is a reflection in part of both of these factors. For 1981, the tax tables were revised so that the 1040A could be used by taxpayers with taxable incomes of up to \$50,000 regardless of marital status, in contrast to an adjusted gross income limit of \$20,000 or \$40,000, depending on marital status, in recent prior years. The change to taxable income also removed any limitations (in using the tax tables) based on the number of exemptions. Also contributing to the increase was the addition of the space on the back of the Form 1040A to report more than \$400 of interest income or more than \$400 of dividend income. Thus, taxpayers who previously filed the 1040 only because interest or dividend income exceeded \$400 could now use Form 1040A. Space was also provided on the 1040A to report All-Savers Certificate Interest.

NONTAXABLE RETURNS

Early estimates show that the number of individual income tax returns filed with no income tax reported decreased by 0.8 percentage points from the comparable period last year. Of the 90.7 million returns filed by April 29, only 19.7 percent of them reported on income tax, compared with 20.5 percent of the 89.2 million returns reporting no income tax for Tax Year 1980. The number with no tax and with adjusted gross

income of \$5,000 or more decreased from 5.0 million to 4.3 million, or by about 15 percent. This may reflect a decrease in the number of families with children or other dependents, earning between \$5,000 and \$6,500, or an increase in the number of older taxpayers. Table 1 shows the total number of returns filed, with and without an entry for income tax, for Tax Years 1979, 1980, and 1981, by adjusted gross income class.

EXCLUSION OF INTEREST AND DIVIDENDS

Many of the 42.2 million taxpayers claiming the new combined dividend/interest exclusion showed the maximum amount allowed for their filing status: \$400 for taxpayers who are married and filing a joint return, \$200 for all others. Only about 300,000 returns are estimated to have mistakenly shown a dividend/interest exclusion in excess of what their filing status entitled them to (these errors are corrected in regular "revenue processing"). This 42.2 million for Tax Year 1981 compares with the 10.0 million taxpayers reporting dividends (after exclusion) and 47.2 million taxpayers reporting interest income for Tax Year 1980. Additional data on this topic are presented in Table 2.

ALL-SAVERS CERTIFICATE INTEREST

Interest received on the All-Savers Certificate (ASC)--established by the Economic Recovery Tax Act of 1981--was reported on only 1.2 million of the 90.7 million returns filed. The maximum amount of the exclusion allowed--\$2,000 for married persons filing a joint return and \$1,000 for all other taxpayers--was claimed on only 0.1 percent of all the returns filed, but on 9.2 percent of all the returns filed with ASC exclusion. The low incidence of taxpayers reporting ASC interest is a result of the Tax Year 1981 data representing only the first three months of ASC activity (the certificates were not available until October 1, 1981) and the policy of many financial institutions to pay ASC interest only at certificate maturity [2]. Tax Year 1982 data should show the full extent of ASC usage and the degree to which ASC reporting compares with expected increased Individual Retirement Arrangement (IRA) reporting. (IRA's are expected to compete directly with ASC's as will the exclusion of reinvested dividends on utility stock.)

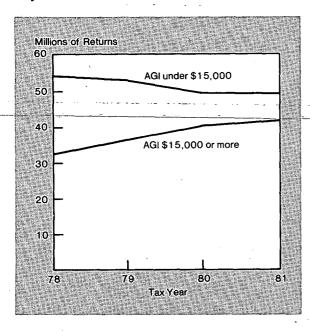
All-Savers Certificate (ASC) Exclusion

Size of	Returns	Percent of
ASC Exclusion	(Thousands)	Total
Under \$1,000 \$1,000 or more		1.2 0.1

INCOME DISTRIBUTION

The proportion of higher income returns relative to the total has been steadily increasing. This increase is a result of several factors—among them, inflation, higher real income, and increases in the minimum income filing requirements. From Tax Year 1978 to Tax Year 1981, the number of returns with AGI's under \$15,000 decreased by 5.0 million while the number with adjusted gross incomes of \$15,000 or more increased by 9.2 million. The percent of returns filed with AGI's of \$15,000 or more increased from about 37.5 percent for 1978 to about 45.9 percent for 1981. During the same period, returns with AGI's under \$15,000 decreased from about 62.5 to about 54.1 percent. Thus, as indicated by the chart below, the relationship between the rate of increase in the number of returns in the \$15,000 and over AGI class and the rate of decrease in the number of returns in the under \$15,000 AGI class is becoming almost inverse. (See also Table 3.)

Number of Returns by Size of Adjusted Gross Income



ATTACHED FORMS AND SCHEDULES

The W-2 (Wage and Earning) Statements continue to be the single most prevalent attachment to the return and one of the most informative [3]. Most of the Forms 1040A had W-2 statements attached, regardless of the income class (see Table 4). By contrast, only 80.2 percent of the Forms 1040 had a W-2 statement, and as the income level rose, the incidence of the presence of a W-2 statement also rose. Review of a selection of returns showed that the Forms 1040 with AGI's under \$15,000 without a W-2 statement frequently had a W-2P (Recipient of Pension and Annuity Income) Statement or a Schedule SE (Computation of Social Security Self-Employment Tax) attached. Of the 6.9 million Forms 1040 with Schedules SE attached, 3.1 million, or 45.3 percent of them were in the under \$15,000 adjusted gross income class.

Table 5 shows, on a selected basis, which forms and schedules are attached to individual income tax returns by adjusted gross income class. The number of returns filed with an attached Schedule B (Interest and Dividend Income) increased by 2.8 million over a comparable period last year. While ASC interest reporting may have contributed to this increase, overall high interest rates and a constant reporting

requirement of \$400 or more were probably the main reasons. The number of Forms 1040 filed with a Schedule E (Supplemental Income Schedule), as expected, decreased by 2.2 million. This decrease reflected the fact that new lines were added to the Tax Year 1981 basic Form 1040 for taxpayers who had previously filed a Schedule E to report only pension and annuity income. In keeping with the concept of tax return simplification, these individuals are no longer required to file a Schedule E.

As shown in the table below, returns claiming itemized deductions on Schedule A have been a steadily rising proportion of all Form 1040 returns during the last four years. They now represent about 53 percent of the Forms 1040 filed by the end of April, as compared with about 49 percent for 1976. Inflation may have caused more taxpayers to be eligible to itemize deductions on Schedule A. When there are tax form or law changes designed to encourage wider use of the Form 1040A, many former 1040 filers who were not itemizing deductions may have switched to the simpler Form 1040A. This would obviously cause the ratio of the remaining 1040 filers with itemized deductions to total 1040 filers to rise. The decrease in 1040 returns filed with an attached Schedule A from Tax Year 1976 (49.0 percent) to Tax Year 1977 (45.6 percent) resulted from the substantial increase in the zero bracket amount (ZBA) for Tax Year 1977. The increase in the ZBA for 1979 was apparently not enough to offset rising expenses for itemizers.

Po Tax Year		temized Deductions: All Returns
1976	49.0	31.9
1977	45.6	27.3
1978	46.7	27.6
1979	49.6	28.9
1980	51.7	30.6

31.1

1981

Form 1040 returns filed with the Form 5695 (Residential Energy Credit) showed a marked decline from last year. Only 3.8 million Forms 1040 had an attached Form 5695 compared with 4.6 million for a comparable period last year. The decreasing number of Forms 1040 filed claiming the residential energy credit is due in part both to the length of time the credit has been allowed and the lifetime maximum credit per principal residence (which have therefore decreased the number of persons qualifying to claim it). The credit was based on the cost of items for home energy conservation and the costs for renewable energy property installed after April 19, 1977, and before January 1, 1986. For Tax Year 1978, the first year the credit was allowed, 5.6 million taxpayers claimed it, compared with the 4.6 million claiming it for Tax Year 1980 and the 3.8 million claiming it for Tax Year 1981.

Tax Year	Returns with Form 5695 (Thousands)
1978 1979 1980	 4,499
1981	

The types of attachments to the Forms 1040 tabulated for Table 5 were limited to those for which statistics were requested by Internal Revenue Service officials for tax administration purposes. Therefore, forms or schedules not shown were not requested even though some of them may have been filed in substantial numbers—such as the Form 4835 (Farm Rental Income And Expenses and Summary of Gross Income from Farming or Fishing).

PREPARER RETURNS

The proportion of preparer returns--returns with a paid preparer signature -- decreased by 0.6 percent from the comparable period last year. In fact, preparer returns have been on the decline for the past five years [3]. Over half of the Form 1040 returns--but less than one sixth of the Form 1040A returns--had a preparer signature. The incidence of preparer signatures is directly related to income class, as can be seen in Table 6. As the level of income increases, so does the likelihood of a preparer signature. The trend for all returns with paid preparer signatures is notably different from those of the two components-Forms 1040 and Forms 1040A. This difference is mostly the result of the progressively larger proportions of middle income taxpayers now using the 1040A. Tax-payers using the Forms 1040 tend to be concentrated in the higher adjusted gross income classes, and because of the increased complexity of returns in the higher income classes, a higher incidence of paid preparer signatures is observed.

OFFICIAL LABEL AND ENVELOPE USAGE

Overall, use of the official IRS label increased by 0.7 percentage points despite the Service's decision not to ask the Postal Service to forward 1981 tax packages in those cases where the taxpayer had moved since the prior year's filing. The percentage of returns with the label affixed decreased by 0.8 percent for Form 1040 filers and increased by a significant 2.9 percent for Form 1040A filers—a shift from the previous year when an increase in label usage was found for Form 1040 filers and a decrease was found for Form 1040A filers. On the other hand, use of the official IRS envelope decreased by 4.6 percent for Form 1040 filers and by 3.5 percent for Form 1040A filers, but the envelope usage percentages remained significantly higher than those for official label usage.

	Official Label Usage					
	1979	1980	1981			
1040 1040A		64.9% 51.2	64.1% 54.1			
Total	59.6	59.3	60.0			
	Official Env	velope Usage				
1040 1040A		78.9% 81.1	74.3% 77.6			
Total	76.8	79.8	75.7			

For the first time, the Service used presorting for 86.4 million or about 97 percent of the total tax packages mailed to taxpayers for use in filing their Tax Year 1981 Forms 1040/1040A. According to the U.S. Postal Service, the carrier route presorting improved deliveries of the tax packages; that is, more taxpayers received their tax packages than in the past, resulting in fewer tax packages being destroyed by the Postal Service because they were undeliverable. This improvement in deliveries apparently caused the slight increase in label usage (see Table 7).

DATA SOURCES AND LIMITATIONS

Data for the Taxpayer Usage Studies (TPUS) were derived from a continuous daily sampling of returns at the time of their receipt at the Internal Revenue Service Centers. Sampling was conducted at a designated 1:13,000 rate for Tax Years 1979 and 1980--and 1:15,000 for Tax Year 1981. Estimates from

the annual Taxpayer Usage Studies apply exclusively to Form 1040 and Form 1040A returns filed on current year tax forms, and cover about 94 percent of the total individual returns expected to be filed for the year. The designed sampling rate was set at 1/15,000 in order to yield a sample of about 6,000 Forms 1040 and 1040A from the Tax Year 1981 filing population, projected to be about 96,200,000 individual income tax returns. However, in recent years, the average effective sampling rate has exceeded the designated rate; in addition, the effective rate for 1040A's has exceeded that for 1040's [4]. Because of the differences between designed and effective sampling rates, the estimation procedure is based on using the inverse of the effective sampling rates (for Forms 1040 and 1040A separately) as the weighting factors for the returns in this sample. For example, for Tax Year 1981, the official IRS Service Center count of Forms 1040 received by April 30, 1982, was 53,544,000, while the number of 1040's in the sample was 3,450. Thus the effective weight for Forms 1040A was 15,520 (53,544,000 divided by 3,450). For Forms 1040A the official IRS count received by April 30 was 37,126,000, while the number of sample 1040A's was 3,011. Thus, the weight assigned was 12,330. Because the TPUS samples are not stratified by income size and the sampling rates are low, only frequency estimates are available.

Coefficient of Variation

Because the statistics are estimates based on samples, they are subject to sampling error. The upper limits of the coefficient of variation shown below for Tax Year 1981 are intended as a general indication of the reliability of the data.

Coefficient of Variation	Estimated Number Form 1040 1/	of Returns: Form 1040A
2.0 3.0 4.0 5.0 10.0 20.0 30.0 40.0	38,797,500 17,243,300 9,699,400 6,207,600 1,551,900 388,000 172,400 97,000	30,822,800 13,699,000 7,705,700 4,931,600 1,232,900 308,200 137,000 77,100 62,100
49,300		32,100

1/ Use this column when Forms 1040 and 1040A are combined.

NOTES AND REFERENCES

The statistics in this article are based in all cases and for all years on filings through the end of April. Data from the entire year's filings for 1981 will appear separately in the Winter 1982-83 issue of the Bulletin using the larger Statistics of Income sample now being processed.

- [1] Table Al, <u>Employment and Earnings</u>, Bureau of Labor Statistics, U.S. Department of Labor, March, 1982.
- [2] New York Times, February 3, 1982, p. D.13.
- [3] Grayson, Paul, "Individual Income Tax Returns: Selected Characteristics from the 1980 Taxpayer Usage Study," <u>SOI Bulletin</u>, Vol. 1, No. 3, page 14.
- [4] Grayson, Paul, op. cit., page 13.
- [5] Grayson, Paul, op. cit., page 18.

Table 1.—All Returns: Entry for Tax (Line 35, Form 1040; Line 15a, Form 1040A) Classified by Size of Adjusted Gross Income, Tax Years 1979, 1980, and 1981

[All figures are estimates based on samples--numbers of returns are in thousands]

				Size of a	djusted gr	oss income		
Type of entry for tax, type of return	Total	Under \$5,000	\$5,000 under \$10,000	\$10,000 under \$15,000	\$15,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 and over
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All tax year 1981 returns filed	90,670	19,166	16,138	13,733	10,815	15,817	12,005	2,99
Entry	72,799	5,530	13,703	13,031	10,419	15,332	11,789	2,99
"-", etc.) Percent with no entry	17,870 19.7	13,636 71.1	2,435 15.1	702 5.1	395 3.7	485 3.1	217 1.8	
All tax year 1980 returns filed	89,154	17,646	18,137	13,406	11,160	15,706	10,581	2,51
Contry	70,907	4,485	15,062	12,640	10,543	15,248	10,427	2,49
"-", etc.) Percent with no entry	18,247 20.5	13,161 74.6	3,075 17.2	766 4.7	617 5.4	458 2.7	154 1.5	*2 1.
All tax year 1979 returns filed	88,768	18,814	19,473	14,461	11,603	14,526	8,132	1,75
Intry	69,650	4,592	16,308	13,551	11,197	14,261	8,008	1,73
"-", etc.) Percent with no entry	19,118 21.5	14,222 75.6	3,165 16.2	910 6.3	406 2.8	. 265 1.8	124 1.5	*2 1.

^{*}Estimate should be used with caution because of the small number of sample returns on which it is based.

Table 2.--All Returns: Percentage Distribution of Returns With Entry for Exclusions for Dividends/Interest, Classified by Marital Status, Tax Year 1981

[All figures are estimates based on samples--numbers of returns are in thousands]

		Marital status							
Exclusions (Line 8d)	Total	Single	Married filing joint return	Married filing separate return	Unmarried head of household	Qualifying Widow(er)			
	(1)	(2)	(3)	(4)	(5)	(6)			
All returns filed	90,670	39,206	42,330	1,094	7,884	155			
Percent	100.0	100.0	100.0	100.0	100.0	100.0			
Returns without exclusions	53.5	63.4	39.6	79.9	75.9	30.0			
Returns with exclusions, total	46.5	36.6	60.4	20.1	24.1	70.0			
\$1 under \$200 \$200 \$201 under \$400	9.2 14.2 1.9	7.9 28.2 0.1	11.0 0.5 4.1	1.4 17.6	6.9 17.0 -	10.0 50.0			
\$400 More than \$400	20.9 0.2	0.2 0.2	44.6 0.3	1.1	0.2	10.			
11 Form 1040 returns filed	53,544	15,039	34,019	466	3,864	15.			
Percent	100.0	100:0	100.0	100.0	100.0	100.			
Returns without exclusions	32.9	32.1	30.0	63.3	58.2	30.0			
Returns with exclusions, total	67.1	67.9	70.0	36.7	41.8	70.			
\$1 under \$200 \$200 \$201 under \$400	11.6 19.0 3.0	10.5 56.6 0.1	12.3 0.6 4.6	3.3 33.3	10.8 30.9	10.0 50.0			
\$400 More than \$400	33.2 0.3	0.4	52.1 0.3	-	-	10.0			
11 Form 1040A returns filed	37,126	24,167	8,310	629	4,020	n.a			
Percent	100.0	100.0	100.0	100.0	100.0				
Returns without exclusions	83.3	83.0	78.8	92.2	92.9				
Returns with exclusions, total	16.7	17.0	21.2	7.8	7.1				
\$1 under \$200 \$200 \$201 under \$400	5.6 7.4 0.4	6.2 10.6 0.1	5.5 0.1 1.8	5.9 -	3.1 3.7				
\$400	3.2	0.1 0.1	13.8	2.0	0.3				

n.a. - Not applicable.

NOTE: Detail may not add to total because of rounding.

NOTE: Detail may not add to total because of rounding.

Individual Income Tax Returns, 1981 Taxpayer Usage

Table 3.--All Returns: Entry for Filing Status, Classified by Adjusted Gross Income and by Type of Return, Tax Year 1981

[All figures are estimates based on samples--numbers of returns are in thousands]

				S	ize of ad	justed gr	oss incom	e	
Filing status	Total	Negative AGI	No entry on line for AGI ¹	\$1 under \$1,000	\$1,000 under \$3,300	\$3,300 under \$4,300	\$4,300 under \$5,000	\$5,000 under \$5,400	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
All returns filed	90,670	351	2,988	2,146	8,215	3,192	2,275	1,166	
Single	39,206 42,330 1,094 7,884	124 214 - *12	2,021 674 *40 253	1,695 210 *90 151	6,468 972 188 571	2,524 409 *12 247	1,616 353 - 306	800 211 *12 142	
Qualifying widow(er) with de- pendent child	155	-	-	-	*16	-	_	-	
All Form 1040 returns filed	53,544	326	559	481	2,173	1,133	931	512	
Single Married filing joint return Married filing separate return Unmarried, head of household Qualifying widow(er) with dependent	15,039 34,019 468 3,864	124 202 - -	233 279 *16 *31	326 124 *16 *16	1,474 590 *16 *78	823 248 - *62	605 217 - 109	295 186 - *31	
child	155	-	-	-	*16	_	_	-	
All Form 1040A returns filed	37,126	*24	2,429	1,665	6,042	2,059	1,344	653 506	
Single Married filing joint return Married filing separate return Unmarried, head of household	24,167 8,310 629 4,020	*12 - *12	1,788 395 *25 222	1,369 *86 *74 136	4,994 382 173 493	1,702 160 *12 185	1,011 136 - 197	*25 *12 111	
		Size of adjusted gross incomeContinued							
Filing status		\$5,400 under \$6,400	\$6,400 under \$7,400	\$7,400 under \$10,000	\$10,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 and over	
		(9)	(10)	(11)	(12)	(13)	(14)	(15)	
All returns filed		3,280	3,612	8,081	24,548	15,817	12,005	2,995	
Single	• • • • • • • • • • • • • • • • • • • •	2,070 703 *65 442	2,246 749 *99 519	4,711 2,131 124 1,069 *47	10,357 10,946 279 2,935 *31	3,170 11,518 155 943 *31	1,185 10,494 *31 264 *31	217 2,747 - *31	
All Form 1040 returns filed		1,319	1,195	3,383	14,030	13,068	11,438	2,995	
Single Married filing joint return Married filing separate return Unmarried, head of household Qualifying widow(er) with dependent child		714 481 *16 109	667 404 - 124 -	1,505 1,428 *62 341 *47	4,439 7,543 155 1,862 *31	2,468 9,607 155 807 *31	1,148 9,964 *31 264 *31	217 2,747 - *31	
All Form 1040A returns filed		1,960	2,417	4,698	10,518	2,750	567	-	
Single Married filing joint return Married filing separate return Unmarried, head of household		1,356 222 *49 333	1,578 345 *99 395	3,206 703 *62 727	5,918 3,403 123 1,073	703 1,911 - 136	*37 530 - -	- - - -	

^{*}Estimate should be used with caution because of the small number of sample returns on which it is based. Line 10, Form 1040A; line 31, Form 1040.

NOTE: Detail may not add to total because of rounding.

Individual Income Tax Returns, 1981 Taxpayer Usage

Table 4.--All Returns: Presence of Form(s) W-2, Classified by Size of Adjusted Gross Income and by Type of Return, Tax Year 1981

[All figures are estimates based on samples--number of returns are in thousands]

				Size of ad	justed gro	ss income		
Attachment of Form(s) W-2, type of return	Total	Under \$5,000	\$5,000 under \$10,000	\$10,000 under \$15,000	\$15,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 and over
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns filed	90,670	19,165	16,138	13,733	10,815	15,817	12,005	2,995
AttachedNot attached	79,366 11,304	16,028 3,138	13,541 2,597	11,526 2,207	9,626 1,189	14,653 1,164	11,323 683	2,669 326
l Form 1040 returns filed	53,544	5,603	6,410	7,186	6,844	13,068	11,438	2,995
Attached	42,943 10,600	2,934 2,669	3,973 2,437	5,028 2,157	5,680 1,164	11,904 1,164	10,755 683	2,669 326
1 Form 1040A returns filed	37,126	13,563	9,728	6,547	3,970	2,750	567	-
Attached	36,423 703	13,094 468	9,568 160	- 6,498 *49	· 3,946 *25	2,750 ~	567 -	. <u>-</u>
				(Perce	ntage of r	eturns)		
All returns filed	100.00	100.0	100.0	100.0	100.0	100.0	100.0	100.0
AttachedNot attached	87.5 12.5	83.6 16.4	83.9 16.1	83.9 16.1	89.0 11.0	92.6 7.4	94.3 5.7	89.1 10.9
1 Form 1040 returns filed	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Attached Not attached	80.2 19.8	52.4 47.6	62.0 38.0	70.0 30.0	83.0 17.0	91.1 8.9	94.0 6.0	89.1 10.9
l Form 1040A returns filed	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Attached	98.1 1.9	96.5 3.5	98.4 1.6	99.2 0.8	99.4 0.6	100.0	100.0	-

^{*}Estimate should be used with caution because of the small number of sample returns on which it is based. NOTE: Detail may not add to total because of rounding.

Table 5.--All Form 1040 Returns: Percentage Distribution of Schedules and Forms Attached With Entries Classified by Size of Adjusted Gross Income, Tax Year 1981

					Size of a	djusted g	ross inco	me	
Schedule or Form	Type of attachment	Total	Under \$5,000	\$5,000 under \$10,000	\$10,000 under \$15,000	\$15,000 under \$20,000	\$20,000 under \$30,000	\$30,000 under \$50,000	\$50,000 and over
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	All Form 1040 returns filed Percent	53,544 100.0	5,603 100.0	6,410 100.0	7,186 100.0	6,844 100.0	13,068 100.0	11,438 100.0	2,995 100.0
A B C	Itemized Deductions Interest and Dividend Income Profit or (Loss) From Business or Profession	52.7 47.0 12.9	8.8 45.4 18.6	21.3 47.7	34.8 45.4 14.0	48.1 41.9	62.6 41.4 12.4	84.0 51.2 9.1	93.3 73.1 13.0
D	Capital Gains and Losses	12.5	11.4	6.5	12.7	7.5	9.5	17.1	33.7
E F G	Supplemental Income Schedule Farm Income and Expenses Income Averaging	15.0 4.0 10.1	13.8 8.9 0.6	12.4 4.4 0.7	14.2 5.4 3.0	12.5 3.0 7.9	13.2 3.6 7.6	15.6 2.2 20.2	35.2 2.1 42.0
R }	Credit for the Elderly	1.0	-	3.4	1.6	0.9	0.6	0.3	0.5
SE 1116	Computation of Social Security Self-Employment Tax Computation of Foreign Tax	12.9	20.0	16.5	13.4	13.6	11.0	8.6	14.5
2106	Credit Employee Business Expenses	0.5 9.4	0.3 3.3	5.1	0.4 8.2	0.7 7.3	0.4 9.7	0.8 14.5	1.0 16.1
2119 2210/	Sale or Exchange of Principal Residence Underpayment of Estimated	1.4	1.1	1.2	1.1	0.5	1.3	2.3	3.1
2210F 2440	Income Tax	5.9 0.9	4.7 3.1	6.5 1.7	6.9 1.3	5.2 0.7	5.1 0.2	4.3 0.4	15.6 -
2441 3468	Credit for Child and Dependent Care Expenses Computation of Investment	7.3	0.6	3.4	9.7	8.6	8.7	9.6	5.2
3903	Credit	5.7 1.8	7.5 -	3.6 1.9	5.2 1.7	6.1 2.5	4.9 2.3	4.5 1.6	14.5 2.6
4255 4 5 62 4625	Recapture of Investment Credit Depreciation Computation of Minimum Tax	0.8 7.7	1.9 12.2	1.0 6.1	0.4 7.8	0.5 6.4	0.1 7.2	0.5 6.6	3.1 11.9
4684	IndividualsCasualties and Thefts	0.1 1.0	0.3	0.7	0.2 0.4	- 0.7	1.2	0.3 1.6	1.0 2.1
4797	Supplemental Schedule of Gains and Losses	1.9	3.6	0.7	1.9	0.9	1.5	1.6	6.7
5329	Return for Individual Retire- ment Arrangement Taxes	0.1	0.3	_	0.2	0.2	-	0.1	-
5695 5884	Residential Energy Credit Jobs Credit	7.0 0.1	0.8	1.7	5.4 -	8.2 0.2	8.4	10.9	10.9
6249/ 6249A	Computation of Overpaid Wind- fall Profit Tax	0.3	0.6	0.2	0.2	0.5	0.2	0.3	0.5
6251 6252	Alternative Minimum Tax Compu- tation Computation of Installment	0.7	-	-	0.2	0.7	0.5	1.6	2.6
	Sale Income	1.2	0.8	0.5	1.7	0.5	0.7	2.2	3.1

Individual Income Tax Returns, 1981 Taxpayer Usage

Table 6.--All Returns: Entry for Paid Preparer Signature Classified by Adjusted Gross Income and by Type of Return, Tax Year 1981

[All figures are estimates based on samples--numbers of returns are in thousands]

		Negative		Siz	e of adj	usted gr	oss inco	me	
Paid preparer signature, type of return	Total	or no entry for AGI	\$1 under \$5,000						\$50,000 and over
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All returns filed	90,670	3,338	15,827	16,138	13,733	10,815	15,817	12,005	2,995
Entry	33,848	651		5,161	4,782	4,475	7,117	5,739	1,831
No entry	56 , 822	-2,688	711,735	10,978	8,951	6,340	8,700	6,267	1,164
All Form 1040 returns filed	53,544	885	4,718	6,410	7,186	6,844	13,068	11,438	2,995
Entry	28,324 25,220	466 419	, -	3,632 2,778	3,771 3,414	3,896 2,949	6,612 6,456	5,665 5,773	1,831 1,164
All Form 1040A returns filed	37,126	2,454	11,109	9,728	6,547	3,970	2,750	567	-
Entry	5,524 31,602	185 2,269	, ,	1,529 8,200	1,011 5,536	580 3,391	506 2,244	*74 493	-

^{*}Estimate should be used with caution because of the small number of sample returns on which it is based. NOTE: Detail may not add to total because of rounding.

Table 7.--All Returns: Use of Official Preaddressed Label and Official Envelope Classified by Preparer Status and by Type of Return, Tax Year 1981

[All figures are estimates based on samples--numbers of returns are in thousands]

	All returns			Form 1040			Form 1040A		
Characteristics of label and envelope	Total	Paid preparer signature		Total	Paid preparer signature		Total	Paid preparer signature	
		Entry	No entry		Entry	No entry		Entry	No entry
	(1)	(2)	- (3)	(4)	(5)	(6)	(7)	(8)	(9)
All returns filed	90,670	33,848	56,822	53,544	28,324	25,220	37,126	5,524	31,602
Official preaddressed label:	·								
Used, total	54,397	19,078	35,318	34,299	16,168	18,143	20,098	2,922	17,176
Label unchanged	51,351	17,864	33,488	32,561	15,225	17,336	18,791	2,639	16,152
Changes include city/state	461	170	. 290	202	*93	109	259	*62	197
Other changes	2,585	1,045	1,540	1,536	714	823	1,048	222	826
Not used	36,272	14,769	21,503	19,245	12,168	7,077	17,028	2,602	14,426
Official envelope:									
Used	68,620	21,345	47,275	39,793	17,646	22,147	28,828	3,699	25,129
Not used, total	22,049	12,503	9,546	13,751	10,678	3,073	8,298	1,825	6,473
Other envelope No envelope (includes "flat"	17,528	9,930	7,598	10,414	8,241		7,114	1,689	5,425
or "cloth mail")	4,520	2,572	1,948	3,337	2,437	900	1,184	136	1,048

^{*}Estimate should be used with caution because of the small number of sample returns on which it is based. NOTE: Detail may not add to total because of rounding.

Sales of Capital Assets, 1973 — 1980

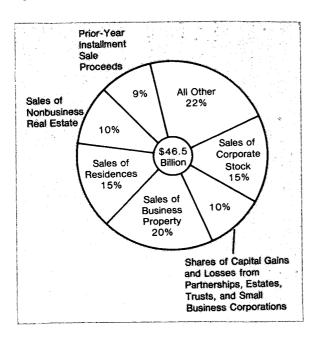
By Bertie Brame and Keith Gilmour*

Gains and losses from sales and exchanges of capital assets on individual income tax returns have been accorded some type of preferential tax treatment almost since the inception of the Federal income tax. Although some summary data are collected annually, detailed information on sales of capital assets is only collected periodically for use in tax policy analysis. The focus here is on the details of those capital asset transactions for two years, 1973 and 1977 with some summary information for 1973-80.

1977, with some summary information for 1973-80.

Over 10 percent of the 86.6 million individual income tax returns filed for 1977 had transactions considered to be sales of capital assets. These transactions, numbering 23.0 million, resulted in gross gains less losses of \$46.5 billion, an \$11.3 billion increase over 1973. The distribution of the number of transactions and amount of gain less loss by broad asset category remained about the same for 1977 as for 1973.

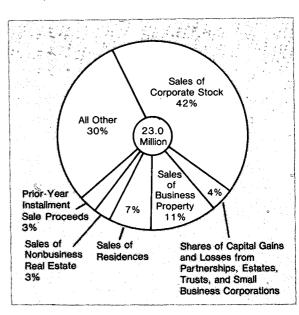
Percentage Distribution of Gains Less Losses from Sales of Capital Assets, by Type of Asset, 1977



Sales of business property, taken as a single asset type, accounted for the largest percentage of net gains. The total of \$9.3 billion resulted from 2.6 million transactions.

As would be expected, corporate stock was the asset type most frequently reported, with 31 percent of the returns with sales of capital assets reporting sales of this asset. However, for 1977 (compared to 1973) there appeared to be a movement away from stock transactions. While returns with corporate stock transactions for 1977 increased about 8 percent over 1973, returns with sales of other securities (bonds, notes, etc.) increased 64 percent, and sales of commodities, including "futures" contracts, increased 39 percent. Asset types accounting for the largest proportion of gross gains less losses for 1977 were business property with \$9.3 billion, personal residences with \$6.9 billion, and corporate stock with \$6.8 billion.

Percentage Distribution of Capital Asset Transactions, by Type of Asset, 1977



Gains and losses from sales or exchanges of capital assets held for a short period were taxed as ordinary income, while gains and losses from sales or exchanges held for a longer term were eligible for special tax treatment. If capital assets received "long-term" treatment, only one-half of the gain (in excess of short-term loss) was taxable. If the sale or exchange resulted in a loss, regardless of how long the property was held, the loss could be completely offset against capital gains and, to a limited extent, against ordinary income.

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HOLDING PERIOD

The Tax Reform Act of 1976 changed a provision in the law that had been in effect for over thirty years. This provision dealt with the holding period of a capital asset. It changed the required holding period for long-term treatment from "more than six months" to "more than nine months." Therefore, for 1977, the gain or loss from the sale or exchange of property held for nine months or less was considered short-term and taxed as ordinary income. If a tax-payer held property more than nine months, the gain or loss from the sale of the property was eligible for long-term treatment. This increase in holding period did not apply to commodity transactions, including futures contracts, which continued to be regulated under the prior holding period rule of more than six months for application of long-term treatment.

The available statistics show that the lengthening of the required holding period apparently had a small overall effect on the distribution (short-term vs. long-term) of capital asset transactions for 1977 in comparison to 1973. In proportion to total transactions, short-term transactions increased from 20 percent for 1973 to 25 percent for 1977, with an absolute increase in short-term transactions of 47 percent between 1973 and 1977. In proportion to total transactions, long-term transactions decreased from 80 percent to 75 percent with an absolute decrease in long-term transactions of 2 percent between 1973 and 1977.

Though total long-term transactions decreased, some of the individual asset types had large increases. Those asset types with the largest increase in long-term transactions were securities other than corporate stock, commodity futures, and qualified gains on live-stock (except poultry) used in trade or business. Securities other than corporate stock had a 58 percent increase over 1973; gain transactions increased over 100 percent, while loss transactions decreased 26 percent. There was an overall increase in commodity futures transactions of 32 percent and in qualified gains on livestock approximately 200 percent.

The extent to which individuals held certain types of assets in order to qualify for short-term or long-term treatment is shown for 1973 and 1977 in Figure A. Data are shown for three categories of asset types: corporate stock, securities other than corporate stock (which included U.S. Government

obligations, State and local Government obligations, and other bonds, notes, and debentures), and all other types of assets for which the return form required a holding period.

LAW CHANGES

Major changes in the law affecting sales of capital assets were introduced by provisions of the Tax Reform Act of 1976. Some of the more significant provisions are explained below. This Act changed the required holding period for long-term capital gain or loss treatment from "more than six months" to "more than nine months" beginning with 1977, and to "more than twelve months" for taxable years beginning after 1977. The exception to this change was for commodities, including futures contracts. Gains and losses from such sales were still considered long-term if the contract was held for "more than six months." For 1977, the maximum amount of net capital loss that could be used to reduce ordinary income increased from \$1,000 to \$2,000. This was further increased to \$3,000 in 1978. Other capital gain benefits were extended to taxpayers age 65 and older who sold their personal residences: the base amount of the gain from sales of residences that could be excluded from taxable income increased from \$20,000 to \$35,000, effective for 1977.

The Revenue Act of 1978 also introduced significant changes, especially in regard to the tax treatment of capital gain income. Prior to November 1978 (and going back to 1942), 50 percent of net long-term capital gains (in excess of any short-term capital losses) could be excluded from adjusted gross income. For transactions after October 1978, 60 percent of the "excess net long-term gains" could be excluded. The alternative tax computation for taxpayers with long-term capital gains and marginal tax rates above 50 percent was abolished, and the computation of the additional tax for tax preferences was divided into two parts: itemized deductions and capital gains tax preferences were subjected to a new graduated "alternative minimum tax" and all remaining tax preferences were subject to the regular 15 percent "minimum tax." In addition, a provision of the Act stated that the capital gains tax preference would no longer be used to offset personal service taxable income in computing

Figure A .-- Percent Distribution of Capital Asset Transactions by Period Held, 1973 and 1977

	Percent distribution							
Period held	Corporat	e stock	Securities other than corporate stock		All other assets			
	1973	1977	1973	1977	1973	1977		
	(1)	(2)	(3)	(4)	(5)	(6)		
Under 4 months 4 through 6 months 7 through 9 months 10 through 12 months 13 through 15 months 16 months or more Period held not determinable ¹	17.6 8.2 7.6 5.7 4.2 47.0 9.7	17.0 7.9 4.9 7.2 4.2 51.9 7.0	22.6 4.7 3.2 3.5 3.8 51.2 10.9	9.5 4.2 3.6 4.4 3.4 68.6 6.3	5.0 1.8 1.9 2.3 1.5 45.4 42.3	9.8 3.2 3.1 3.3 1.5 42.9 36.2		

¹Includes transactions for which a period held could not be calculated because of missing dates, or for which the calculated period held did not agree with the definition of "short-term" or "long-term" for the year noted.

the "maximum tax." Finally, the Act provided for a once-in-a lifetime exclusion to taxpayers who attained age 55 prior to the date of sale of their residence. The taxpayer could elect to exclude up to \$100,000 of the gain realized on the sale.

HISTORICAL PERSPECTIVE

During the period 1973-1980, net gains from sales of capital assets shown on individual income tax returns increased by a substantial 80 percent, even though the number of individual returns reporting such gains was less than 10 percent higher for 1980 than for 1973. Over this same period 15 percent fewer taxpayers reported a net loss, but the amount of net loss more than doubled (basically due to changes in the law previously mentioned). As shown in Figure B, the total number of returns on which sales of capital assets were reported increased only slightly, from 8.7 million to 8.9 million over the eight-year period.

The data in Figure B were taken from the annual Statistics of Income reports relating to individual income tax returns [1]. However, the transaction data for 1973 and 1977, shown in the other tables in this article, were obtained from subsamples of the returns used to produce the estimates in the annual reports. The difference in sample sizes, by itself, accounts for some of the differences in estimates for a specific item generated from the two studies for the same year.

In addition, "total returns" in Figure B is an estimate of returns with a net capital gain or loss in adjusted gross income whether or not the individual had any current year transactions (e.g., only a loss carried over from a previous year). The scope of return coverage in the special transaction studies for 1973 and 1977 is elaborated upon below under "Data Sources and Limitations."

BACKGROUND AND DESCRIPTION OF ASSETS

The Revenue Act of 1921 defined capital assets as property held for profit or investment for more than two years (whether or not connected with trade or business) but excluded property held for personal use or consumption by the taxpayer and family, stock in trade, or property which could be included in inventional trade. tory. This definition was refined, with the addition of exceptions, to its present description: any property held by the taxpayer (whether or not connected with a trade or business), except (1) stock in trade or other property includable in inventory; (2) personal property held primarily for sale to customers in the course of the taxpayer's trade or business; (3) notes or accounts receivable acquired in the ordinary course of trade or business for services rendered or from sale of stock in trade; (4) depreciable property used in the taxpayer's trade or business (even though the property may have been fully depreciated); (5) real property used in the taxpayer's trade or business; (6) a copyright, a literary, musical or artistic composition or similar property (but not a patent or invention) held by the taxpayer responsible for it; and (7) certain Government obligations issued at a discount on or after March 1, 1974, payable without interest, and maturing at a fixed date not exceeding one year from issue date.

The Internal Revenue Code also included a benefit provision which provided "preferential" treatment to other types of properties excluded from the definition of capital assets. Code section 1231 allowed for the grouping of gains and losses from certain business property and certain other property types (such as most breeding livestock, unharvested crops sold with the land, and certain mineral rights) held for more than six months (or nine months beginning in 1977). All gains were grouped together and all losses were similarly grouped. If the gains exceeded the losses, long-term capital gain or loss treatment was extended to each gain and loss. If the gains did not exceed the losses, ordinary income tax treatment was extended to all transactions.

Figure B.--Gains and Losses From Sales of Capital Assets

[Number of returns are in thousands and money amounts are in millions of dollars]

Income year	Total number of returns	Net gain less loss	Net	gain	Net loss		
			Number of returns	Amount	Number of returns	Amount	
	(1)	(2)	(3)	(4)	(5)	(6)	
1973	8,742 7,983 7,575 8,519 8,736 8,711 8,642 8,929	16,671 13,470 14,072 18,562 20,777 23,231 28,448 29,660	6,438 5,310 5,061 6,081 6,346 6,605 6,616 6,974	18,201 15,378 15,799 20,207 23,363 26,232 31,331 32,723	2,304 2,673 2,513 2,437 2,390 2,107 2,026 1,956	1,529 1,908 1,727 1,645 2,587 3,001 2,883 3,064	

NOTE: Detail may not add to total because of rounding.

Sales of Capital Assets, 1973 — 1980

Description of Assets/Transactions (Arranged in the Order of Table 2)

Type of Asset/Transaction	Internal Revenue Code Section		
Corporate Stock	Stock in any corporation, and warrants. Excluded from this classification for the purpose of this article, but included in "Other Types of Assets," were stock options or privileges, calls, puts, spreads, straddles, stock retired on liquidation of a corporation.	1236	
Securities Other Than Corporate Stock:			
U.S. Government Obligations	Bonds, notes, and other evidences of indebtedness issued by the U.S. Government or its possessions.	1232	
State and Local Government Obligations	Investments in obligations of State or U.S. possession, including obligations of political subdivisions and the District of Columbia.	1232	
Other Bonds, Notes, and Debentures	Securities issued by corporations, banks, insurance companies, as distinguished from U.S. Government, State, and local bonds.	1232(a)(2)	
Commodities, Including Futures Contracts	Most sales or exchanges of crops or staples resulting from an obligation to buy or sell a fixed quantity of a commodity on a specific date at a fixed price. Except for a hedging transaction, a capital gain or loss resulted if the commodity future was a capital asset.	1233	
Capital Gain Distributions	Long-term capital gains distributed or credited to stock-holders in the form of cash or other property by regulated investment companies.	852(b)(3)(A),(D) 857(b)(3)(A), (B)	
Share of Capital Gain or Loss From Partnerships and Fiduci- aries	Capital gains and losses realized by partnerships and from fiduciaries and imputed to the partners and to beneficiaries, respectively, who, in turn, reported their distributive shares on their individual income tax returns.	702, 665(d)	
Capital Gain Distributions From Small Business Corpora- tions	Distributions from earnings and profits, reduced by the special tax imposed at the corporate level, taxed directly through each stockholder during any taxable year of an electing Small Business Corporation.	1375(a)	
Liquidation Distributions	Cash or other property received by a stockholder when a corporation was liquidated.	301(c)(3)(A)	
Lump-Sum and Other Retirement Plan Distributions	Lump-sum payments to employees from a qualified annuity plan or from an exempt trust which formed part of a pension, profit sharing or stock bonus plan due to various reasons for separation from service.	402(a)(2)	
Sale or Involuntary Conversion of Certain Depreciable Property:			
Involuntary Casualty Conversions	Depreciable business or nonbusiness property that was compulsorily converted into money or dissimilar property that resulted in a gain or loss.	1231	
Involuntary Theft Conversions	Depreciable business or nonbusiness property that was converted by theft, including larceny and embezzlement.	1231	
Involuntary Conversions by Other Than Casualty or Theft	Trade or business property (other than that converted due to casualty or theft) held for less than nine months. This asset, which provided supplemental gain or loss from sales or exchanges, was included because it was an integral part of the gains and losses reported on the supplemental schedule of gains and losses.	1231	

Description of Assets/Transactions--Continued (Arranged in the Order of Table 2)

Type of Asset/Transaction	Brief Description	Internal Revenue Code Section	
Sale or Involuntary Conversion of Certain Depreciable PropertyContinued			
All Other Livestock, Except Poultry, Including Certain Livestock Used in Trade or Business	Cattle, hogs, horses, mules, donkeys, sheep, goats, furbearing animals (such as mink), and other mammals.	1231	
Cut Timber	Timber that was cut or contracted to be cut for sale or for use in taxpayer's trade or business.	1231 (631)	
Other Farm Land With Un- harvested Crop	Farm land with unharvested crops that was sold (with no retention rights or options) or exchanged at the same time and to the same person. Crops included fruit and nut trees.	1231(b)(4)	
Qualified Trade or Business Assets and Transactions Not Elsewhere classified	Business Assets (either real property or depreciable property) subject to capital gain or loss treatment that could not be classified as a specific section 1231 asset type.	1231	
Qualified Gains on Nonfarm Depreciable Business and Personal Property, Except Certain Buildings	Depreciable personal property such as tangible machinery and equipment and intangible patents and copyrights.	1245	
Qualified Gains on Other Depreciable Real Property, Including Certain Buildings	Depreciable real property (such as buildings and their structural components) and intangible real property (such as leases of land).	1250	
Qualified Gains on Farm Land With Unharvested Crop	"Farm recapture" property, other than livestock. This property, which included business property and unharvested crops, necessitated the maintenance of an excess deductions account.	1251	
Qualified Gains on Livestock, Except Poultry Used in Trade or Business	Depreciable livestock used in farming, including race horses. Any gain from the sale of such livestock was reported as ordinary income to the extent it was attributable to depreciation after 1969. Any excess over the depreciation amount was treated as capital gain.	1251	
Standing Timber	Investment property held by the taxpayer that was sold and treated the same as the sale or exchange of any other capital asset.	-	
All Other Farm Land	Farm land with expenditures for soil and water conservation (under section 175) and land clearing expenditures (under section 182).	1252	
0il and Gas Property	Operating mineral interests in oil and gas wells or geother-mal deposits. Any excess gain over certain intangible drilling and development costs was treated as capital gain.	1254	
Personal Residence	Principal residence or the home in which the taxpayer lived.	1034	
Nonbusiness Real Estate	Unimproved real estate; rights-of-way on property; rental property, and all other real estate other than reported as: farm land with unharvested crop, other farm land, real estate subdivided, residences, and business assets.	1221(2)	
Prior-Year Installment Sales Proceeds	The classification used to capture deferred payments received from sales or exchanges of capital assets.	~	
Other Types of Assets or Transactions	Other assets (such as mortgages, nonbusiness bad debts, life interest in estates, termination payments to employees, patents, and foreign currency conversions). Also includes property which the taxpayer did not specifically identify.	-	

SOURCE: Internal Revenue Code of 1954 - Supplemental Report, Statistics of Income--1973, Sales of Capital Assets Reported on Individual Income Tax Returns, Publication 458.

Table 1.--Number of Returns, Gross Gain and Gross Loss for Selected Asset Types, 1973 and 1977

[All figures are estimates based on samples--money amounts are in thousands of dollars]

		1973		1977			
Asset type	Number of returns	Gross gain	Gross loss	Number of returns	Gross gain	Gross loss	
	(1)	(2)	(3)	(4)	(5)	(6)	
All returns, total	7,373,211	50,552,376	15,405,350	8,845,115	60,021,334	13,534,115	
Corporate stock	2,561,659 1226,404 73,052 21,307,105 735,105-	182,973 1,261,514	1,261,559 117,228	1371,140 101,414 1,540,638	1,688,881 1,098,216	1,665,428 40,803	
Sale or involuntary conversion of certain depreciable property	1975,464 - 795,237 579,536 860,694	3,361,760 5,454,478 4,085,245 4,920,209	200,883	1,460,678 637,472	6,955,407 4,595,919	24,731 176,720	

¹Data are overstated to the extent a taxpayer reported more than one type of property included in this combined category.

Table 2.--Number of Returns, Transactions, Sales Price, and Gross Gain or Loss, By Asset Type, 1977

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Asset type	Number of returns	Number of transactions ¹	Sales price	Gross gain	Gross loss
	(1)	(2)	(3)	(4)	(5)
All returns, total	8,845,115	22,989,445	235,337,415	60,021,334	13,534,115
Corporate stock Securities other than corporate stock Commodities, including futures contracts Capital gain distributions	2,760,804 ² 371,140 101,414 1,540,638	665,080 307,165	58,338,779 11,783,798 17,876,635	13,684,818 560,076 1,688,881 1,098,216	6,861,349 356,168 1,665,428 40,803
Share of capital gain or loss from partnerships and fiduciaries	717,185	835,635	-	4,844,618	562,317
Capital gain distributions from Small Business Corporations Liquidation distributions Lump-sum and other retirement plan distributions Sale or involuntary conversion of certain depreciable property	49,494 41,067 69,067 ² 858,114	57,068 87,922	- - - 6,288,879	267,257 931,551 335,081 3,008,545	1,665 14,015 - 444,134
Qualified gains on nonfarm depreciable business and personal property, except certain buildingsQualified gains on other depreciable real property, including certain buildings	425,722 235,000		4,808,748 9,870,569	2,255,518 3,410,294	-
Qualified gains on farm land with unharvested crop and livestock, except poultry, used in trade or business	² 139,412 92,600		606,221 695,399	392,384 602,549	_ 335
All other farm land Oil and gas property Personal residence ³ Nonbusiness real estate Prior-year installment sales proceeds Other types of assets ⁴	1,350 1,395 1,460,678 637,472 572,433 2,075,276	1,837 1,492,843 738,616 769,722	43,718 88,195 24,581,400 15,462,834 54,019,024 30,873,217	74,537 6,955,407 4,595,919	24,731 176,720 7,708 3,378,741

¹Connotes sales, exchanges, involuntary conversions, and distributions of gain or loss from partnerships, fiduciaries, Small Business Corporations, retirement plans, and enterprise liquidations.

category. 2 Returns having only capital gain distributions (reported on line 34, page 2, Form 1040) were excluded from this study of detailed transactions by asset type. These returns were estimated to number over 1.6 million with distributions grossing over \$6.6 million.

ciaries, Small Business Corporations, retirement plans, and enterprise inquitations.

2Data are overstated to the extent a taxpayer reported more than one type of property included in this combined

category.

The gain shown for sales of residences is the gross amount realized. Only a small part is taxable gain because of the deferral and exclusion provisions of the tax law relating to sales of residences.

Other types of assets not elsewhere classified or transactions which were unidentified.

NOTE: Due to reporting of more than one asset type on most returns, the number of returns for "All returns, total" will be less than the sum of return totals for the specific asset type.

Table 3.--Short-Term and Long-Term Transactions for Selected Asset Types, 1977

[All figures are estimates based on samples -- money amounts are in thousands of dollars]

Asset type	Number of returns	Number of transactions ¹	Gross gain	Gross loss
		Short-term tra	nsactions	
All returns, total	1,577,763	² 5,644,770	4,617,046	5,226,641
Corporate stock	825,795 ³ 57,209 87,590 - 154,445	130,327 279,600	1,336,387 79,631 956,982 - 284,128	112,208
Sale or involuntary conversion of certain depreciable property Personal residence ⁴ Nonbusiness real estate Prior-year installment sales proceeds	³ 43,936 25,231 44,849 13,018	² 25,391 49,474	29,476 420,233 183,817 24,881	53,426 4,024 22,054 (⁵)
All returns, total	7 ,6 85,139	² 16,426,254	55,404,287	8,307,474
Corporate stock Securities other than corporate stock Commodities, including futures contracts Capital gain distributions Share of gain or loss from partnerships and fiduciaries	2,494,285 ³ 333,808 18,926 1,540,638 681,190	534,753 27,565 1,540,756	12,348,430 480,445 731,900 1,098,216 4,560,489	243,961 368,636 40,803
Sale or involuntary conversion of certain depreciable property Personal residence4	³ 834,092 547,975 604,896 567,982	² 549,031 689,142	2,979,068 6,535,174 4,412,103 3,947,859	

¹Connotes sales, exchanges, involuntary conversions, and distributions of gain or loss from partnerships, fiduciaries, Small Business Corporations, retirement plans, and enterprise liquidations.

²Excludes residence transactions where all gross gain was deferred or excluded. Therefore, the sum of shortterm and long-term transactions in this table is less than the total transactions shown in table 2.

3 Data are overstated to the extent a taxpayer reported more than one type of property included in this combined

category.

The gain shown for sales of residences is the gross amount realized. Only a small part is taxable gain because of the deferral and exclusion provisions of the tax law relating to sales of residences. See also footnote 2. Less than \$500.

Table 4.--Number of Returns, Adjusted Gross Income, Income Tax, Transactions, and Gross Gain Less Loss, by Size of Adjusted Gross Income for Returns With Selected Asset Types, 1977

[All figures are estimates based on samples--money amounts are in thousands of dollars]

[1111 ligates are escimates based on samples money	dillounes are	In thousands	or dortars,		
Asset type and size of adjusted gross income	Number of returns	Adjusted gross income less deficit	Total income tax	Number of transactions ¹	Gross gain less loss
Total Assets	(1)	(2)	(3)	(4)	(5)
All returns, total	8,845,115	226,937,185	46,484,762	22,989,445	46,487,219
No adjusted gross income	184,945 1,974,532	-4,371,304 11,490,693		563,440 3,992,260	1,566,337
Under \$10,000 \$10,000 under \$20,000	2,390,176	35,745,856	3,460,932	4,681,856	5,062,006 6,167,548
\$20,000 under \$50,000	3,462,877	103,954,650		9,361,304	14,395,442
\$50,000 under \$100,000	630,684	42,283,845		2,962,088	7,113,060
\$100,000 under \$500,000	195,620	31,406,075		1,338,759	8,107,371
\$500,000 or more	6,281	6,427,370		89,738	4,075,453
Corporate Stock				,	.,,
All returns, total	2,760,804	94,455,666	22,408,815	9,684,635	6,823,469
No adjusted gross income	20,282	-1,216,572	23,343	95,826	-31,705
Under \$10,000	458,890	2,647,958	92,124	1,456,131	. 944
\$10,000 under \$20,000	560,153	8,538,539	935,160	1,560,790	-111,006
\$20,000 under \$50,000	1,287,901	40,185,265	6,736,916	4,220,109	1,119,768
\$50,000 under \$100,000	318,438	21,634,665	5,684,688	1,580,682	1,175,559
\$100,000 under \$500,000	110,825	18,163,630	6,727,562	720,271	2,485,543
\$500,000 or more	4,315	4,502,183	2,209,021	- 50,826	2,184,367
Securities Other Than Corporate Stock			•		
All returns, total	² 371,140	² 19,625,291	² 5,874,082	665,080	203,908
No adjusted gross income	1,560	-325,278	8,192	5,902	-89
Under \$10,000	47,590	279,016	10,116	52,563	1,034
\$10,000 under \$20,000	46,215	668,907	73,638	70,209	600
\$20,000 under \$50,000	169,828	5,247,103	939,696	296,392	71,501
\$50,000 under \$100,000	69,178	4,811,849	1,274,468	142,164	68,295
\$100,000 under \$500,000	34,346	6,001,038	2,192,509	86,717	44,934
\$500,000 or more	2,423	2,942,657	1,375,465	11,133	17,636
Commodities, Including Futures Contracts					
All returns, total	101,414	4,184,702	1,119,023	307,165	23,453
No adjusted gross income	1,439	-214,809	3,427	6,244	49,399
Under \$10,000	14,910	73,272	4,232	16,858	-81,596
\$10,000 under \$20,000	19,557	300,069	19,804	40,267	-49,551
\$20,000 under \$50,000	42,154	1,299,606	185,614	128,803	-50,958
\$50,000 under \$100,000	15,536	1,065,303	263,378	66,119	+10,965
\$100,000 under \$500,000 \$500,000 or more	7,459 359	1,265,694 395,567	457,021 185,546	44,762 4,112	81,353 85,772
	339	393,367	105,540	4,112	83,772
Capital Gain Distributions					
All returns, total	1,540,638	42,470,398	9,269,838	1,540,756	1,057,413
No adjusted gross income	11,747	-355,636	3,199	11,747	16,480
Under \$10,000	325,036	1,911,105	67,521	325,036	146,466
\$10,000 under \$20,000	426,602	6,415,706	707,181	426,602	227,821
\$20,000 under \$50,000	609,006	18,600,623	3,258,232	609,006 128,889	323,934 131,399
\$50,000 under \$100,000 \$100,000 under \$500,000	128,771 38,339	8,592,581 6,143,394	2,341,075 2,322,523	38,339	109,167
\$500,000 under \$500,000\$500,000 or more	1,137	1,162,625	570,108	1,137	102,145
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Footnotes at end of table.

Table 4.--Number of Returns, Adjusted Gross Income, Income Tax, Transactions, and Gross Gain Less Loss, by Size of Adjusted Gross Income for Returns With Selected Asset Types, 1977--Continued

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Asset type and size of adjusted gross income	Number of returns	Adjusted gross income less deficit	Total income tax	Number of transactions ¹	Gross gain less loss
Share of Gain or Loss From Partnerships and Fiduciaries	(1)	(2)	(3)	(4)	(5)
All returns, total	717,185	31,112,894	8,606,434	835,635	4,282,301
No adjusted gross income. Under \$10,000. \$10,000 under \$20,000. \$20,000 under \$50,000. \$50,000 under \$100,000. \$100,000 under \$500,000. \$500,000 or more.	11,909 82,198 152,208 293,587 119,991 54,866 2,426	-1,208,376 505,471 2,225,496 9,527,856 8,268,909 9,268,624 2,524,915	22,548 26,552 221,256 1,615,425 2,148,866 3,390,284 1,181,503	14,591 94,971 170,099 341,681 142,976 68,032 3,285	222,014 176,212 273,080 1,201,823 958,948 1,075,674 374,549
Sale or Involuntary Conversion of Certain Depreciable Property					
All returns, total	² 858,114	² 14,874,849	² 3,080,217	1,388,725	2,564,411
No adjusted gross income. Under \$10,000. \$10,000 under \$20,000. \$20,000 under \$50,000. \$50,000 under \$100,000. \$100,000 under \$500,000. \$500,000 or more.	104,219 259,815 272,571 170,820 35,331 14,595 763	-1,432,516 1,443,677 3,992,866 5,113,951 2,383,521 2,497,102 876,246	13,178 29,730 292,362 753,500 630,829 943,051 417,565	209,063 408,254 462,979 235,107 49,528 22,405 1,388	237,748 387,475 557,501 702,110 334,929 296,691 47,951
Personal Residence ³			,		
All returns, total	1,460,678	31,851,438	4,860,258	1,492,843	6,930,676
No adjusted gross income. Under \$10,000. \$10,000 under \$20,000. \$20,000 under \$50,000. \$50,000 under \$100,000. \$100,000 under \$500,000. \$500,000 or more.	9,938 334,168 416,948 634,527 53,970 10,902 225	-191,133 1,949,595 6,414,940 18,209,019 3,541,445 1,704,925 222,647	2,369 54,240 576,993 2,618,280 877,700 619,473 111,202	9,997 340,037 429,945 646,789 54,728 11,116 231	59,329 1,520,042 1,983,833 2,626,319 516,874 212,083 12,194
Nonbusiness Real Estate					
All returns, total	637,472	15,941,404	3,278,896	738,616	4,419,199
No adjusted gross income. Under \$10,000. \$10,000 under \$20,000. \$20,000 under \$50,000. \$50,000 under \$100,000. \$100,000 under \$500,000. \$500,000 or more.	8,564 175,677 164,447 231,425 42,084 14,675 600	-386,026 1,087,577 2,518,203 6,846,699 2,812,956 2,395,540 666,456	7,121 32,388 240,321 1,074,923 715,936 883,129 325,077	11,286 212,018 172,079 265,647 55,655 20,975 956	92,861 872,187 620,292 1,646,482 650,154 440,388 96,834
Prior-Year Installment Sales Proceeds					
All returns, total	572,433	16,131,058	3,755,251	769,722	3,965,031
No adjusted gross income. Under \$10,000 \$10,000 under \$20,000 \$20,000 under \$50,000 \$50,000 under \$100,000 \$100,000 under \$500,000 \$500,000 or more	6,336 146,054 148,974 205,226 46,330 18,783 730	-274,704 997,734 2,242,930 6,105,883 3,116,990 3,172,021 770,204	5,570 45,220 239,967 983,483 862,756 1,224,290 393,966	8,834 177,231 179,683 288,884 80,115 33,725 1,250	79,498 369,113 615,296 1,150,367 673,124 749,813 327,820

¹Connotes sales, exchanges, involuntary conversions, and distributions of gain or loss from partnerships, fiduciaries, Small Business Corporations, retirement plans, and enterprise liquidations.

NOTE: Detail may not add to total because of rounding.

ciaries, Small Business Corporations, retirement plans, and enterprise liquidations.

Data are overstated to the extent a taxpayer reported more than one type of property included in this combined

category.

The gain shown for sales of residences is the gross amount realized. Only a small part is taxable gain because of the deferral and exclusion provisions of the tax law relating to sales of residences.

DATA SOURCES AND LIMITATIONS

Detailed data on capital asset transactions were obtained from subsamples of the basic Statistics of Income samples of individual income tax returns for 1973 and 1977 [3]. For 1973, approximately 112,000 returns were examined to select those which had one or more capital asset transactions reported on Schedule D, Capital Gains and Losses (Form 1040); Form 4797, Supplemental Schedule of Gains and Losses; or Form 2119, Sale or Exchange of Personal Residence [4]. For 1977, a total of 117,000 returns were examined to select those with capital asset transactions from the same tax forms. There was one significant difference in the return coverage for the two studies. For both years, if a taxpayer did not have any transactions other than capital gain distributions, that individual could report such gain on Form 1040 and did not need to file a separate Schedule D. Such returns were excluded from the study for 1973, but were included for 1977.

The estimates in this article are intended to represent individual income tax returns, Forms 1040, that had sales of capital assets whether in fact these transactions resulted in a net gain or loss in adjusted gross income. The detailed data on capital asset transactions were combined with other basic tax return information (such as adjusted gross income, taxable income, income tax before credits, total income tax, and net capital gain or loss) for use in the tabulations included in this article.

For both Tax Years 1973 and 1977, a capital loss carryover by itself was not considered transaction-information; therefore, returns—that—only—reported—aloss from a previous year on the Schedule D were omitted from the study. A return was counted as having a transaction if there was at least one amount reported for any of the following: gross sales price, cost or expense of sale, or gain (loss). Basically, this was true whether or not all of these elements were required to be reported for a particular asset type. Certain asset types (capital gain and other distributions) generally had no gross sales price or cost reported. Certain types of transactions (deferred gain and breakeven) had details on gross sales price and cost, but no gain or loss. For other transactions, the taxpayer may have reported any combination of elements in constructing a transaction. However, since only one element needed to be present for determining that a return had a sale or exchange, the estimates are presumed to provide complete coverage of all types of transactions.

Because the estimates are based on samples, they are subject to sampling error. The return data were also subject to nonsampling error due to reporting idiosyncrasies as well as differences between form instruc-

tions and their interpretation by filers.

A general description of Statistics of Income sample procedures and limitations of the data are shown in Appendix II at the end of this Bulletin. Sampling variability relating to the sales of capital asset estimates for 1973 and 1977 are shown in the coefficient of variation table below.

Coefficient of Variation	Estima Number of	
	1973	_1977_
2.6%	9,144,000	8,523,700
2.9	7,350,000	6,851,400
3.0	6,868,200	6,402,200
4.0	3,863,300	3,601,300
5.0	2,472,500	2,304,800
10.0	618,100	576,200
20.0	154,500	144,100
30.0	68,700	64,000
40.0	38,600	36,000
50.0	24,700	23,000

REFERENCES

- [1] Additional information on returns with sales of capital assets reported on Schedule D and the components of net capital gain or net capital loss included in adjusted gross income can be found in the annual publications of Statistics of Income—Individual Income Tax Returns.
- [2] A synopsis of the law pertaining to sales of capital assets, 1913-1962, can be found in the Supplemental Report, Statistics of Income-1962, Sales of Capital Assets Reported on Individual Income Tax Returns. Major changes in the law between 1963-1973 are explained in the Supplemental Report, Statistics of Income-1973, Sales of Capital Assets Reported on Individual Income Tax Returns.
- [3] Information on the full SOI samples from which the subsamples were drawn is published in Statistics of Income-Individual Income Tax Returns for Tax Years 1973 and 1977.
- [4] For a complete description of the subsample, see Supplemental Report, Statistics of Income--1973, Sales of Capital Assets Reported on Individual Income Tax Returns.

Crude Oil Windfall Profit Tax, 1981

By Rashida Belal*

For the first time since the enactment of the windfall profit tax, quarterly liability per barrel has significantly decreased. The average windfall profit tax dropped from \$9.94 per barrel in the second quarter of 1981 to \$8.55 for the third quarter, a decrease of almost 14 percent.

This excise tax is generally levied on the "windfall profit" generated by the phased decontrol of oil prices. The windfall profit tax base is the removal price per barrel (generally the price the oil is sold for) less the adjusted base price (a set base price adjusted by a quarterly inflation factor) and the State severance tax adjustment.

The windfall profit, and therefore the windfall profit tax liability, fluctuates largely with changes in oil prices. These fluctuations have been especially apparent since the full decontrol of oil in January 1981. For the second quarter of 1981, the removal price rose 11 percent over the last quarter of 1980, the adjusted base price remained about the same, and the tax rose 43 percent. In contrast, the removal price dropped by almost \$2.00 per barrel from the second to the third quarter of 1981, a result of the excess supply of crude oil. Since the adjusted base price increased at the same time, the result was a significant decrease in the profit and tax.

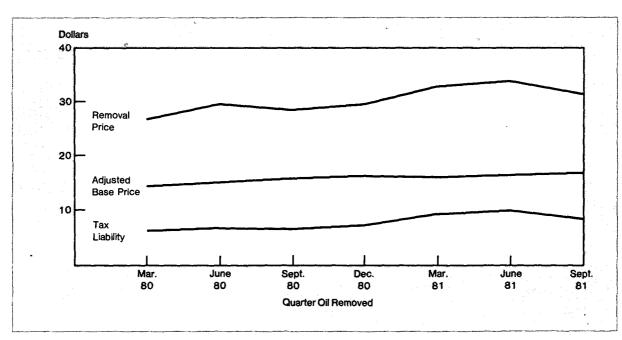
The windfall profit tax liability is also affected by adjustments made by the withholding agent. These adjustments can result from under- or over-withholding or the net income limitation. Should any of these occur, the depositing or withholding agent is

responsible for correcting the error, to the extent possible, by adjusting the amounts withheld in succeeding quarters. These adjustments may be positive or negative. For example, for the quarter ending in March 1981, total reported tax liability before adjustments was \$7.0 billion. However, adjustments had a net positive effect and liability after adjustments rose to \$7.2 billion. These positive adjustments were largely due to 1980 year-end account balancing by withholding agents. In June 1981, the tax liability before adjustment rose to \$7.2 billion; however, after adjustments, it amounted to somewhat less, \$7.1 billion. Below is a summary of windfall profit tax liability and adjustments by quarter since the inception of the tax.

Windfall Profit Tax After Adjustments (Millions)

Quarter Ending	Tax Before Adjustments	Adjustments	Tax After Adjustments
Total	\$31,511	\$-1,152	\$30,359
Mar. 1980 June 1980 Sept. 1980 Dec. 1980 Mar. 1981 June 1981 Sept. 1981	788 2,842 3,413 3,918 6,953 7,253 6,344	- -21 -88 -927 +242 -107 -251	788 2,821 3,325 2,991 7,195 7,146 6,093

Components of Windfall Profit Tax Liability: Averages per Barrel by Quarter Oil Removed



^{*}Prepared under the direction of Michael Coleman, Acting Chief, Special Projects Section, Foreign Statistics Branch

Table 1.--Windfall Profit Tax Liability by Oil Tier and Tax Rate for the Quarter Ending September 1981,
Aggregate Components of Windfall Profit

[Money amounts are in thousands of dollars]

	Tax liability	Tax liability Returns with components of windfall profit before					t1	
Oil tier and tax rate	adjustments, quarter ended September 30, 1981	Number of barrels of oil (000's)	Removal value	Adjusted base value	State severance tax adjustment	Windfall profit	Tax liability before adjustments	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	
All returns, total	6,343,667	686,198	21,401,446	11,060,854	588,232	9,752,366	5,867,552	
Returns with tax liability shown by oil tier and tax rate, total	5,901,700	686,198	21,401,446	11,060,854	588,232	9,752,366	5,867,552	
Tier one, other than Sadlero- chit oil: Taxed at 70 percent Taxed at 50 percent Tier one, Sadlerochit oil: Taxed at 70 percent	3,969,307 278,977 562,692	325,002 30,363 118,971	10,737,351 1,037,844 2,711,411	4,812,695 461,062 1,767,777	33,732	5,652,420 543,050 803,847	3,956,694 271,523 - 562,692	
Taxed at 70 percent	163	57	1,237	852	57	328	163	
Tier two oil: Taxed at 60 percent Taxed at 30 percent	505,170 164,453	57,069 35,566	1,899,923 1,191,014	1,021,876 631,721	-	835,527 534,238	501,315 160,273	
Tier three oil (taxed at 30	٠							
Newly_discovered_oil	318,763	81,559	2,826,747	1,716,044		1,043,645	313,095	
Incremental tertiary oil Heavy oil	17,377 84,790	4,453 33,155	153,232 842,684	92,015 556,808		57,736 281,575	17,321 84,472	
Total returns with components not shown	441,967	- :	-	· _	<u>-</u>	-	_	

¹Represents 90 percent of all returns tabulated and 92 percent of the liability. NOTE: Detail may not add to total because of rounding.

Table 2.--Windfall Profit Tax Liability by Oil Tier and Tax Rate for the Quarter Ending September 1981, Components of Windfall Profit, Average Dollars per Barrel

	Returns with components of windfall profit						
Oil tier and tax rate	Removal price	Adjusted base price	State severance tax adjustment	profit	Tax liability before adjustments		
	(1)	(2)	(3)	(4)	(5)		
All returns, total	31.19	16.12	0.86	14.21	8.55		
Tier one, other than Sadlerochit oil: Taxed at 70 percent Taxed at 50 percent	33.03	14.80	0.84	17.39	12.17		
	34.18	15.18	1.11	17.89	8.95		
Tier one, Sadlerochit oil: Taxed at 70 percent Taxed at 50 percent	22.79	14.86	1.17	6.76	4.73		
	21.49	14.80	0.99	5.70	2.85		
Tier two oil: Taxed at 60 percent Taxed at 30 percent	33.29	17.90	0.75	14.64	8.78		
	33.49	17.76	0.70	15.03	4.51		
Tier three oil (taxed at 30 percent): Newly discovered oil Incremental tertiary oil Heavy oil	34.66	21.04	0.82	12.80	3.84		
	34.40	20.66	0.78	12.96	3.89		
	25.41	16.79	0.13	8.49	2.55		

Table 3.--Exempt Oil Volume by Tier and Category, Quarter Ending September 1981 [Barrels]

		,			Tier three	
	Total	Total Tier one		Newly discovered oil	Incremental tertiary oil	Heavy oil
	(1)	(2)	(3)	(4)	(5)	(6)
Total	19,520,560	14,478,350	3,178,642	1,496,388	176,923	190,256
Exempt governmental interest	17,292,863	13,325,208	2,495,898	1,192,847	125,381	153,528
Exempt charitable interest	934,035	468,513	264,782	142,259	51,152	7,328
Exempt Indian oil	1,143,300	591,933	407,138	137,519	137	6,571
Exempt Alaskan oil	342	-	-	342	_	_
Exempt front-end oil	150,019	92,655	10,822	23,420	253	22,829

NOTE: Detail may not add to total because of rounding.

DEFINITIONS

Brief definitions of the terms used in these tables are given below.

Adjusted Base Price.—For tier one and tier two oil it is the base price multiplied by the inflation adjustment, which is derived from the "implicit price deflator" published by the Department of Commerce. For tier three oil the implicit price deflator is increased by an additional 2 percent.

Adjustments to Liability.--Corrections applied to the current quarter's liability in order to correct over- and under-withholding in previous quarters.

Base Price.—For tier one oil, the upper tier ceiling price, as defined by Department of Energy price control regulations, which would have applied to the oil had it been produced and sold in May 1979, reduced by 21 cents. For tier two and three oil, the base prices were \$15.20 and \$16.55, respectively, adjusted for grade and quality.

<u>Crude Oil.</u>—The term applies only to natural crude petroleum and does not include synthetic petroleum, such as oil from shale or tar sands. It does, however, include natural gas liquids treated as crude oil under the June 1979 energy pricing regulations issued by the Department of Energy.

<u>Exempt Alaskan Oil.</u>—Oil from a reservoir other than the Sadlerochit reservoir that has been commercially exploited by any well north of the Arctic Circle; and oil produced north of the Alaska-Aleutian Range, and at least 75 miles from the nearest point of the Trans-Alaska Pipeline System.

Exempt Charitable Oil.—Oil produced from economic interests held by charitable medical facilities and educational institutions (as defined in Internal Revenue Code section 170), if such interest was held on January 21, 1980, and at all times thereafter; and oil produced from interests held by a church on January 21, 1980, if, prior to January 22, 1980, the net proceeds of such oil were dedicated to the support of a medical facility or educational institution.

<u>Exempt Front-End Oil</u>.--Certain oil that the Department of Energy deregulates to be used to finance a tertiary recovery project (see Tier Three Oil, Incremental Tertiary Oil). This category of oil is not in existence due to the deregulation of all domestic oil after January 28, 1981.

<u>Exempt Governmental Oil</u>.—Oil produced from an economic interest held by a State or political subdivision (including agencies and instrumentalities), the net income from which is used for public purposes.

Exempt Indian Oil.—Oil produced from mineral interests held by or on behalf of Indian tribes or individuals on January 21, 1980, which is one of the following: (a) production received by Indian tribes and individuals from Tribal Trust Lands (the title to such land is held by the United States in trust for the tribes), (b) production from land or mineral interests held by an Indian tribe eligible for services provided to Indians by the Secretary of the Interior, or (c) oil proceeds which are paid into the U.S. Treasury to the credit of tribal or native trust funds pursuant to law. This exemption also applies to production of any Alaskan Native Corporation prior to 1991.

Net Income Limitation.--The windfall profit on a barrel of oil may not exceed 90 percent of the net income attributable to the barrel.

<u>Removal Price.</u>—Generally, the price for which a barrel of oil is sold. In some instances, a constructive sale price is used.

<u>Sadlerochit Oil.</u>—Crude oil production from the Sadlerochit reservoir in the Prudhoe Bay oil field in Alaska.

State Severance Tax Adjustment.—A State severance tax is a tax imposed by a State with respect to the extraction of oil. The windfall profit is reduced by the amount by which the severance tax exceeds that which would have been imposed had the oil been valued at its adjusted base price.

<u>Stripper Oil</u>.--In general, oil from a property from which the average daily production per well has been 10 barrels or less for any consecutive 12-month period after 1972.

<u>Tier One Oil.</u>—All domestically-produced crude oil other than any oil classified in tiers two or three, or explicitly exempted from the tax by the Act. This includes the bulk of domestic oil from reservoirs proven to be productive before 1979.

Tier Two Oil.—Any oil which is from a stripper well property within the meaning of the June 1979 Department of Energy pricing regulations and oil from a U.S. economic interest in a National Petroleum Reserve except that oil classified as tier one and tier three oil.

Tier Three Oil, Heavy Oil.—All crude oil which is (1) produced from property which had a weighted average gravity of 16.0 degrees or less on the American Petroleum Institute (API) scale, corrected to 60 degrees Fahrenheit, for the last month of production prior to July 1979 or (2) oil from a property with a weighted average gravity of 16.0 degrees API or less, corrected to 60 degrees Fahrenheit, for the taxable period.

Tier Three Oil, Incremental Tertiary Oil.—Production in excess of a base level on a property on which a qualified tertiary recovery project (one which utilizes one of several specific chemical, fluid or gaseous recovery methods to extract oil not recoverable using standard techniques) has been undertaken. The non-incremental oil (i.e., the amount of production up to the base level) remains in the otherwise applicable tier.

Tier Three Oil, Newly Discovered Oil.—Crude oil that is sold after May 31, 1979, and that is produced from (1) an outer continental shelf area for which the lease was entered into on or after January 1, 1979, and from which there was no production in Calendar Year 1978 or (2) an on shore property after Calendar Year 1978.

<u>Windfall Profit.</u>—The excess of the removal price of the barrel of oil over the sum of the adjusted base price and the severance tax adjustment.

REFERENCES

- [1] See also Belal, Carol and Clark, Phil, "Windfall Profit Tax Liability for 1980," SOI Bulletin, Volume 1, No. 2, pages 50-54.
- [2] Joint Committee on Taxation (Staff), General Explanation of the Crude Oil Windfall Profit Tax Act of 1980, U.S. Government Printing Office, 1981

Appendices

APPENDIX I - Selected Statistical Series

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Selected Statistical Series

Table 1.--Individual Income Tax Returns: Selected Income and Tax Items for Selected Years, 1970-1980 [Money amounts are in thousands of dollars]

Item	1970	1975	1977 -	1978	1979	1980 (Preliminary)
N. 1. 6	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns: All returns	74,279,831 42,376,365	82,229,332 44,140,085	86,634,640 44,004,343	89,771,551 44,483,348	92,694,302 44,855,141	93,616,278 45,124,637
Sources of income: Salaries and wages:	,					
Number of returns	66,965,659	73,520,046 795,399,462	77,345,927 969,403,997	80,278,349 1,090,291,855	83,200,646 1,229,251,389	83,653,341 1,345,004,185
Interest received:						
Number of returns	-32,630,355- 22,021,267	-40,378,240 ₋ 43,433,554	44,005,988_ 54,603,049	46,107,411_ 61,222,522	47,885,069 73,875,462	48,938,320 100,902,810
Taxable pensions and annuities: Number of returns	3,249,558	5,088,937	6,222,199	6,373,564	6,866,851	7,382,764
Amount	7,878,808	20,886,871	29,211,627	32,743,819	37,346,510	43,309,841
Dividends (after exclusion): Number of returns	7,729,939	8,853,491	9,202,378	9,425,819	9,881,105	10,647,455
Amount Net capital gain less loss:	15,806,924	21,892,126	27,020,483	30,206,475	33,482,508	37,971,572
Number of returns	7,962,663	7,574,823	8,736,065	8,711,086	8,641,573	8,793,853
Amount Business net income less loss:	9,006,683	14,071,893	20,776,604	23,231,376	28,448,300	26,978,431
Number of returns	6,159,985	7,242,542	7,774,555	8,194,375	8,562,834	8,794,706
Amount Total adjustments:	30,554,201	39,421,478	49,451,961	53,546,508	56,564,467	54,023,665
Number of returns	6,370,552 7,665,251	9,024,255 15,101,999	9,742,368 19,329,363	10,576,655 -22,364,088	11,543,369 24,778,484	13,080,234 28,025,600
Individual Retirement Arrange-	,,0,3,,25	13,101,777				20,023,000
ment: Number of returns	N/A	1,211,794	2,002,833	1,925,853	2,451,955	2,556,522
Amount Self-Employed Retirement (Keogh):	N/A	1,436,443	2,457,708	2,497,307	3,198,788	3,411,184
Number of returns	591,655	595,892	576,982	548,925	590,189	561,280
Amount	847,692 631,692,540	1,603,788 947,784,873	1,834,734 1,158,492,225	1,804,243 1,302,447,386	2,029,300 1,465,394,530	1,964,847 1,606,265,685
Exemptions:						
Total number Number, age 65 or over	204,126,402 8,904,331	212,202,596 9,937,208	215,176,997 10,480,724	219,867,696 10,996,804	224,691,732 11,322,713	227,090,827 11,835,374
Total amount	127,531,204	159,140,845	161,382,748	164,900,772	223,891,529	226,777,532
Number of returns	73,862,448	81,585,541	81,856,462	85,473,429	87,202,857	88,259,551
Amount Total itemized deductions:	120,549,755	233,181,778	276,170,902	304,282,120	332,957,555	360,638,144
Number of returns	35,430,047	26,074,061	22,896,507	25,756,298	26,483,877	28,791,240
Amount Medical and dental expense	88,178,487 10,585,749	122,260,601	138,519,421 11,006,536	164,432,406 12,203,983	184,168,669 12,915,626	214,784,413 14,832,253
Taxes paidInterest paid	32,014,673 23,929,477	44,141,289 38,885,282	51,974,887 47,825,469	59,506,835 60,681,144	60,674,905 74,427,045	68,820,527 89,407,610
Contributions	12,892,732	15,393,331	17,266,462	19,691,249	22,210,838	25,399,664
Taxable income: Number of returns	59,593,598	65,852,602	81,674,633	85,280,660	86,932,978	87,891,993
Amount	401,154,285	595,492,866	938,968,454	1,062,190,322	1,157,247,646	1,273,558,005
Income tax before credits: Number of returns	59,596,755	65,854,734	68,694,798	73,087,283	74,243,824	75,961,955
Amount Total tax credits: 1	82,138,617	132,452,044	172,111,669	203,803,653	220,099,516	254,211,495
Amount	369,610	8,069,846	13,637,761	17,085,591	6,780,186	6,745,155
Credit for the elderly Residential energy credit	167,656 N/A	128,968 N/A	167,591 N/A	145,255 576,545	131,734 473,603	135,364 556,798
Earned income credit	N/A	252,141	145,581	152,934	495,500	450,829
Income tax after credits Additional tax for tax preferences	83,787,323 121,988	124,382,197 144,100	158,473,908 1,322,915	186,718,062 1,514,475	213,319,330 1,175,188	247,466,339 934,263
Total income tax: Number of returns	59,317,371	61,490,737	64,381,138	68,688,305	71,694,983	73,739,632
Amount	83,909,311	124,526,297	159,796,823	188,232,537	214,494,519	248,400,602

N/A - Not applicable.

¹For tax years 1975, 1977, and 1978, includes the personal exemption credit.

NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Individual Income Tax Returns, appropriate years.

Table 2.--Sole Proprietorship Returns: Selected Income and Deduction Items for Selected Years, 1970-1980

Item	1970	1975	1977	1978	1979	1980
	(1)	(2)	(3)	(4)	(5)	(6)
Total number of businesses	9,399,653	10,881,969	11,345,616 7,748,976	12,017,953 8,254,536	12,329,982 8,330,818	12,701,597 8,215,438
Number with net income Inventory, end of year	6,675,680 12,153,615	7,385,833	19,148,274	21,822,890	24,074,447	24,052,000
Business receipts	237,726,748	339,221,398	393,871,922	443,354,851	487,807,384	505,884,882
Total deductions	204,512,011	294,610,138	342,482,951	384,327,565	427,048,596	450,434,899
Cost of sales and operations Payroll Taxes paid Interest paid Depreciation Pension and profit sharing plans	25,324,395 5,229,009 3,818,791 10,049,833	185,745,453 33,064,066 7,435,330 7,255,904 15,815,144 131,267	211,918,200 36,395,668 8,582,206 9,042,180 18,299,280 141,566	218,590,325 40,576,849 9,362,245 10,869,976 21,206,674 129,775	229,441,138 42,366,149 9,903,005 13,629,184 24,170,602 140,976	237,154,342 41,985,964 10,102,834 16,241,787 25,796,183 146,181
Net income less deficit Net income Deficit	33,214,737 39,335,180 6,120,443	44,611,260 57,272,242 12,660,982	51,388,971 66,571,503 15,182,532	59,027,286 75,329,052 16,301,766	60,758,789 80,277,325 19,518,536	55,449,987 80,306,493 24,856,506

NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Sole Proprietorship Returns, appropriate years.

Table 3.--Partnership Returns: Selected Income Statement and Balance Sheet Items for Selected Years, 1970-1980

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	1970	1975	1977	1978	1979	1980
	(1)	(2)	(3)	(4)	(5)	(6)
Total number of partnerships	936,133	1,073,094	1,153,398	1,234,157	1,299,593	1,379,653
Number with net income	639,795	661,134	710,256	761,753	765,575	774,173
Number of partners	3,697,818	4,950,634	6,079,860	6,121,455	6,954,767	8,788,519
Total assets	116,752,751	235,468,301	296,098,262	353,699,180	447,130,068	597,503,923
Inventory, end of year	n.a.	11,985,431	n.a.	17,202,990	n.a.	33,218,272
Total receipts	93,348,080	148,417,529	180,848,961	219,192,109	258,197,936	291,998,115
Business receipts Interest received Net gain, noncapital assets	90,208,834 942,304 121,505	142,505,781 2,477,173 359,566		207,731,266 4,346,928 957,426	242,653,710 7,246,203 980,769	
Total deductions	83,557,684	140,679,959	167,584,793	204,745,300	242,992,028	283,749,460
Cost of sales and operations Payroll Taxes paid Interest paid Depreciation	46,040,874 12,276,160 3,159,258 4,470,206 4,578,820 84,956	64,672,843 17,074,875 5,770,918 12,097,100 10,108,834 190,127	75,853,364 19,964,455 6,914,357 13,455,385 12,334,740 251,395	87,217,203 22,252,594 7,364,870 16,022,804 14,519,760 260,432	102,096,671 26,092,084 8,328,583 21,275,551 17,662,667 311,926	113,885,668 29,332,417 9,553,145 28,362,385 21,576,189 384,955
Net income less deficit	9,790,396	7,737,570	13,264,168	14,446,809	15,205,908	8,248,655
Net income Deficit	14,419,124 4,628,728	22,431,931 14,694,361	28,929,500 15,665,332	33,689,343 19,242,534	40,000,896 24,794,987	45,061,756 36,813,100

n.a. - Not available.

NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Partnership Returns, for appropriate years.

Selected Statistical Series

Table 4.--Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items for Selected Years, 1970-1979

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	1970	1975	1976	1977	1978	1979
	(1)	(2)	(3)	(4)	(5)	(6)
		•				
Number of returns: Total	1,665,477	2,023,647	2,082,200	2,241,887	2,376,779	2,556,794
Number with net income	1,008,337		1,273,535			
Small Business Corporation				,		517 007
returns Domestic International Sales	257,475	358,413	391,685	428,204	478,679	514,907
Corporation returns	n.a.	6,431	6,911	6,665	7,208	8,066
Total assets	-2-634-706-564	4,286,556,273	4,720,938,670	5,326,389,281	-6-014-452-008	-6,835,056,963—
Inventories	190,401,642	l	350,644,363	l I		
Investments in Government	130,101,01		, ,			
obligations	196,625,390		357,135,346			
Net capital assets, except land	552,838,384		1			1,262,831,629
Total liabilities	1,882,295,401	1.	ŀ	l :		5,119,271,892
Short-term debt	170,884,261	272,123,551	279,666,019 638,277,006	319,805,729		
Long-term debt	362,700,303	1			'	
Net worth	752,411,163	1,097,064,806	1,207,317,461	1,350,970,865	1,494,756,856	1,715,785,070
Total receipts	1,750,776,503	3,198,627,860	3,635,471,982	4,128,304,478	4,714,602,615	5,598,689,129
Business receipts						5,136,075,461
Interest on Government obliga-						
tions	9,687,116 61,883,309		20,498,676 135,511,998		25,381,712 195,479,301	
Other interest	16,524,889		30,518,787			
Net long-term capital gain						
reduced by net short-term						,
capital loss	5,481,580					
Net gain, noncapital assets Dividends received from domestic	5,315,562	7,757,287	8,891,674	11,169,250	.12,137,078	13,3/0,/90
corporations	5,238,421	8,818,282	. 11,968,994	13,932,345	13,321,287	16,824,708
Dividends received from foreign		5 467 706	7 401 440	0 075 0/0	9,277,932	12,713,087
corporations	3,466,515	1				
Total deductions	I	1	•			5,598,689,129
Cost of sales and operations				2,725,009,554	3,113,421,507	3,709,672,825
Taxes paid	49,523,243 62,055,010					
Interest paid	797,029					
Depreciation	52,941,266					
Pension, profit-sharing, stock		•				16 506 000
bonus, and annuity plans	12,225,912	i				•
Net income less deficit	65,901,614					
Net income	83,710,924					1
Deficit	17,809,310					
Income subject to tax Income tax before credits1	72,374,437 32,910,634	-				1
	·					
Tax credits, total	5,414,940 4,548,986					
Foreign tax credit	865,954					
	1	,	ł	1 .	1	
Income tax after credits	27,495,694					
Additional tax for tax preferences Total income tax	265,249 27,838,775					
				1	, , , , , , , , ,	1
Distributions to stockholders	32,012,677	45,224,392	54,644,375	61,536,761	70,294,349	86,613,794
except in own stock	32,012,077	75,227,392	34,044,373	1,550,,701	, , . , . , . ,	

n.a. - Not applicable

 $^{{}^{1}\!\}text{Consists}$ of normal tax, surtax, and alternative tax.

NOTE: Tax law changes have affected the comparability of the data. See the respective Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Corporation Income Tax Returns, appropriate years.

Table 5.--Gross Internal Revenue Collections: Amount Collected by Quarter and Fiscal Year, 1979-82 [Money amounts are in millions of dollars]

	ř ·	T				
Quarter and fiscal year	m		Sou	rce of revenue		
quarter and riscar year	Total	Individual income taxes1	Corporation income taxes ¹	Excise taxes ²	Employment taxes ³	Estate and gift taxes
1979	(1)	(2)	(3)	(4)	(5)	(6)
Total	460,412	251,546	71,448	19,050	112,850	5,519
October 1978 to December 1978 January 1979 to March 1979 April 1979 to June 1979 July 1979 to September 1979	108,284 149,817	49,563 60,070 82,684 59,228	14,745 14,124 28,304 14,275		21,154 28,237 32,775 30,684	1,351 1,385 1,323 1,460
1980 Total	519,375	287,548	72,380	24,619	128,330	6,498
October 1979 to December 1979 January 1980 to March 1980 April 1980 to June 1980 July 1980 to September 1980	·	58,899 68,723 91,480 68,447	14,894 15,074 28,360 14,051	4,902 4,250 7,335 8,132	25,755 32,850 38,036 31,689	1,497 1,524 1,617 1,861
1981						I)
Total	606,799	332,850	73,733	40,420	152,886	6,910
October 1980 to December 1980 January 1981 to March 1981 April 1981 to June 1981 July 1981 to September 1981	,	67,081 77,467 108,600 79,702	14,527 14,844 29,204 15,158	7,305 10,082 11,963 11,069	28,193 39,878 45,510 39,304	1,698 1,628 1,692 1,893
1982						
Total (Year-to-date)	488,204	271,307	53,735	28,393	128,569	6,200
October 1981 to December 1981 January 1982 to March 1982 April 1982 to June 1982	137,570 154,128 196,506	71,526 85,930 113,852	15,898 14,722 23,115	10,577 9,426 8,389	37,654 41,751 49,165	1,915 2,299 1,986

¹Consists of amounts paid by individuals or corporations as estimated tax payments or amounts withheld by

NOTE: Detail may not add to total because of rounding.

SOURCE: Internal Revenue Service, Returns Processing and Accounting Division, Revenue and Accounting Branch.

employers prior to return filing, payments made with the return, and any subsequent payments.

²Consists of taxes imposed on selected products, services, and activities, such as those on alcohol and tobacco products and the windfall profit tax on domestically produced crude oil.

3Composed largely of payroll taxes levied on salaries and wages, such as social security, railroad retirement,

and unemployment taxes.

GENERAL DESCRIPTION OF STATISTICS OF INCOME SAMPLE PROCEDURES AND DATA LIMITATIONS

This appendix discusses typical sampling procedures used in most Statistics of Income (SOI) programs. Aspects covered briefly include sampling criteria, selection techniques, methods of estimation, and sampling variability. Some of the nonsampling error limitations of the data are also described, as well as the tabular conventions employed.

Additional information on sample design and data limitations for specific SOI studies can be found in the separate SOI publications (see References). More technical information is available, upon request, from the Statistics of Income Division.

SAMPLE CRITERIA AND SELECTION OF RETURNS

Statistics compiled for the SOI studies are generally based on stratified probability samples of income tax returns or other forms filed with the Internal Revenue Service (IRS). The statistics do not reflect any changes made by the taxpayer through an amended return or by the IRS as a result of audit. The samples are based on such criteria as: principal business activity; presence or absence of a schedule; State from which filed; size of adjusted gross income (or deficit) or largest of specific income (or loss) items; total assets or size of business and farm receipts.

The probability of a return being designated depends on its sample class or stratum and may range from a fraction of one percent to one hundred percent. Considerations in determining the selection probability for each stratum include the number of returns in the stratum, the diversity of returns in the stratum, and interest in the stratum as a separate subject of study. All this is subject to constraints on the allowable total cost or total sample size for the program.

For most SOI studies, returns are computer designated based on the Taxpayer Identification Number (TIN) which is either the Social Security Number (SSN) or Employer Identification Number (EIN). In some cases, the ending digits of each TIN are compared to a set of numbers randomly selected for each sample class. If the TIN ending digits are in the set, then the return is designated for the sample. Otherwise, it is not designated.

Alternatively, a fixed and essentially random number is associated with each possible TIN. If that random number falls into a range of numbers specified for the return's sample stratum, then it is designated. Otherwise, it is not.

Under either method of selection, the TIN's designated from one year's study are for the most part selected for the next study, so that a large proportion of the new sample are repeaters. This longitudinal character of the sample design improves the estimates of change from one study to the next.

METHOD OF ESTIMATION

In general, weighting factors are obtained by dividing the computer count of returns filed for a sample stratum by the actual number of returns secured for the sample. These weighting factors are then used to in-

flate the sample results to total population levels. During sampling, lists of the returns designated are checked against the returns secured for the sample to insure that the sample designated is the same as the sample selected. Special searches are made for returns not initially secured so that any bias from nonresponse is minimal.

For the individual income tax returns sample, weighting factors are computed for each sample class within each Internal Revenue district, even though the district is not used to designate the sample. This is an example of post-stratified estimation and is used to improve the estimates for the States. Usage of post-stratified estimation is being studied for other SOI studies.

SAMPLING VARIABILITY

The particular sample used in a study is only one of a large number of possible random samples that could have been selected using the same sample design. Estimates derived from the different samples would usually vary. The standard error of the estimate is a measure of the variation among the estimates from all possible samples and is used to measure the precision with which an estimate from a particular sample approximates the average result of the possible samples. The standard error when added to and subtracted from the estimate provides the upper and lower precision limits within which approximately two-thirds of the estimates derived from similarly selected samples would be expected to fall. Ninety-five percent of the estimates would fall in an interval twice as large, the so-called ninety-five percent confidence interval.

In SOI reports the standard error is not directly presented. Instead, the ratio of the standard error to the estimate itself is presented and expressed as a percentage. This ratio is called the coefficient of variation. The user of SOI data may multiply an estimate by its coefficient of variation to recreate the standard error and to construct confidence intervals.

NONSAMPLING ERROR CONTROLS AND LIMITATIONS

Although the previous discussion focuses on sampling methods and the limitations of the data caused by sampling errors, there are other sources of errors which may be significant in evaluating the usefulness of SOI data. These include taxpayer reporting errors, processing errors, early cut-off of sampling, etc. More extensive information on nonsampling errors is presented in SOI reports, when appropriate.

In transcribing and tabulating the information from the returns or forms selected for the sample, checks are imposed to improve the quality of the resultant estimates. Missing entries are imputed during statistical processing by utilizing other information on the return and accompanying schedules. Data may be disaggregated and recombined during editing to achieve consistent statistical definitions. In the future, SOI studies will make use of earlier returns of the same taxpayer to check current data, for instance the industry code. Also, research on better methods of imputing missing data is being conducted.

Quality of the basic data abstracted at the processing centers is controlled by a continuous sampling verification system. In addition, the Statistics of Income Division in the National Office conducts an independent reprocessing of a small subsample of statistically processed returns as a further check. Prior to tabulation, numerous computer tests are applied to each return record to check for inconsistencies.

Finally, before publication, all statistics are reviewed for accuracy and reasonableness in light of provisions of the tax laws, taxpayer reporting variations and limitations, economic conditions, comparability with other statistical series, and statistical techniques used in data processing and estimating.

TABULAR CONVENTIONS

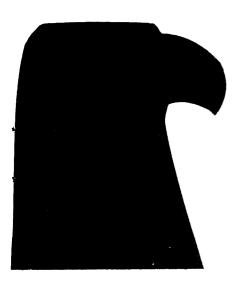
Estimates of frequencies and money amounts that are considered unreliable, due to the small sample size on which they are based, are noted by an asterisk (*) to the left of the data item(s) in the tabulations. The presence of an asterisk indicates that the sample rate is less than 100 percent of the population and there are fewer than 10 sample observations available for estimation purposes.

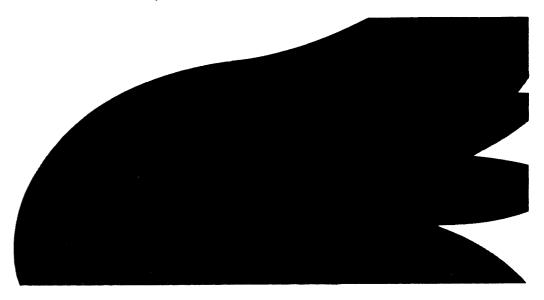
A dash in place of a frequency or amount indicates that no sample return had that characteristic. In addition, a dash in place of a coefficient of variation for which there is an estimate indicates that all returns contributing to the estimate were selected at the loo percent rate.

Whenever a weighted frequency in a data cell is less than 3, the estimate is either combined with other cells or deleted in order to avoid disclosure of information about individual taxpayers or businesses. These combinations and deletions are indicated by a double asterisk (**).

REFERENCES

- [1] Statistics of Income--1979, Individual Income Tax Returns (see especially pages 163 to 166)
- [2] Statistics of Income--1978-79, Corporation Income Tax Returns (see especially pages 11 to 19)
- [3] Statistics of Income--1979, Partnership Returns (see especially pages 5 to 7)
- [4] <u>Statistics of Income--1979-80, Sole Proprietorship</u>
 Returns (see especially pages 5 to 8)
- [6] Statistics of Income--1973, Sales of Capital Assets Reported on Individual Income Tax Returns (see especially pages 17 to 20)
- [7] Statistics of Income--1976, Estate Tax Returns (see especially pages 11 to 12)
- [8] Statistics of Income--1974-1978, Private Foundations (see especially pages 9 to 16)





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Individual Tax Model File, 1966-1979

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The 1979 Individual Tax Model files and the 1977 Employee Plans file are available on a reimbursable basis from the Statistics of Income Division, Internal Revenue Service, Washington, DC 20224.